

HOPE - Helping Our Peninsula's Environment

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Comments on -- Proposed Pebble Beach Golf Course And Mansions Project Which Would Destroy Vital Imperiled Monterey Pine Forest; Revised Draft Environmental Impact Report Remains Monstrously Defective and Colossally Legally Inadequate

Hello Mr. McCue,

We now feel less certain you genuinely care about our environment because of the new DEIR which ignored significant comments from the Coastal Commission, Department of Fish and Game, and Fish & Wildlife Service. Due to the actual environmental impacts of the project even with the mitigations proposed,

**we must seriously object to the project and the Draft Environmental Impact Report
and its facade of a revision for failing to recognize dozens and dozens of potentially significant environmental impacts,
AND for your refusal to respond to the substantial comments from state and federal resource agencies and us.**

What a waste of everyone's time. If this document were honestly prepared as minimally required by law, and as outlined by the Coastal Commission staff, there would be nothing to challenge in court and the project could be legally approved and begin soon. However by your actions as of today you are forcing us to prepare for court and forcing the applicant to delay the project for years.

MANY REAL IMPACTS EVADED

If instead of evading them, the proposed actions' significant environmental impacts were reasonably analyzed using the best available science the inappropriately glowing conclusions of the environmental review are simply not credible because of the much greater genuine impacts.

AN OUNCE OF PREVENTION IS WORTH A POUND OF CURE.

"If you can't replace something, then you'd better preserve it." David Brower, Let the Mountains Talk, Let the Rivers Run, 1995

IRREVERSIBLE HARM REQUIRES PRECAUTIONARY PRINCIPLE

The Passenger Pigeon is gone forever from our planet. Americans not only recklessly killed millions of them, not for consumption - just for sport, we caused their extinction.

Developers, and to a large degree government agencies, consider environmental impacts as only a problem to find loopholes around. They typically trivialize environmental impacts no matter how much evidence exists with "There is no incontrovertible proof yet."

Yet when economic interests are threatened "We shouldn't wait for a full-blown disaster before we act." Bill Pauli, California Farm Bureau President, January 2000 demanding an aggressive campaign to stop the glassy winged sharpshooter insect bearing Pierce's disease. Some people understand the Precautionary Principle only when they want to.

They know much of physics, and most environmental science, is less than a 100% certainty, so they knowingly demand an impossible standard of proof so they can keep making money as long as possible while the environmental damage they are causing grows.

Their position is equivalent to having smoke pouring out of a house and they stop you from calling the fire department until

you can prove it is on fire - that you can see flames is not good enough.

American culture provides overwhelming examples of how irresponsible it is to wait until all harmful effects of a project are even 60% certain. Environmental damage may be irreversible or impossible to mitigate.

Causing a human's death is irreversible and 100% impossible to mitigate.

Causing a wild animal or plant to go extinct is irreversible and 100% impossible to mitigate. Humans have caused numerous species to go extinct and are forcing thousands more to the brink of extinction.

As a society we have decided we will not wait for 100% certainty when it comes to prohibiting or limiting the use of poisons including radiation and pesticides.

California's Environmental Quality Act (CEQA) specifically recognizes this need for precautionary policy in defining a "Significant effect on the environment" as a "POTENTIALLY" substantial, adverse change in the environment - not as merely a "CERTAIN" environmental harm. (Sec. 21068)

Rachel's Environment and Health Weekly #586 reports: "An international group of scientists, government officials, lawyers, and labor and grass-roots environmental activists met January 23-25, 1998 at Wingspread in Racine, Wisconsin to define and discuss the precautionary principle. After meeting for two days, the group issued the following consensus statement:

"Wingspread Statement on the Precautionary Principle

"The release and use of toxic substances, the exploitation of resources, and physical alterations of the environment have had substantial unintended consequences affecting human health and the environment. Some of these concerns are high rates of learning deficiencies, asthma, cancer, birth defects and species extinctions, along with global climate

change, stratospheric ozone depletion and worldwide contamination with toxic substances and nuclear materials.

"We believe existing environmental regulations and other decisions, particularly those based on risk assessment, have failed to protect adequately human health and the environment - the larger system of which humans are but a part.

"We believe there is compelling evidence that damage to humans and the worldwide environment is of such magnitude and seriousness that new principles for conducting human activities are necessary.

"While we realize that human activities may involve hazards, people must proceed more carefully than has been the case in recent history. Corporations, government entities, organizations, communities, scientists and other individuals must adopt a precautionary approach to all human endeavors.

'Therefore, it is necessary to implement the Precautionary Principle: When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically. In this context the proponent of an activity, rather than the public, should bear the burden of proof.

"The process of applying the Precautionary Principle must be open, informed and democratic and must include potentially affected parties. It must also involve an examination of the full range of alternatives, including no action." [End of statement.]"

PREDETERMINED CONCLUSIONS

Unfortunately this environmental impact analysis reflects the principle "most government planning is the systematic collection of evidence to justify predetermined conclusions." (Jim Britell, "The Myth of Planning")

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The environmental documentation is seriously incomplete and ignores many clear environmental damages. This prevents a full and fair evaluation of the environmental consequences of this project by the public and decisionmakers.

"The people of this State do not yield their sovereignty to the agencies which serve them. The people, in delegating authority, do not give their public servants the right to decide what is good for the people to know and what is not good for them to know.

The people insist on remaining informed so that they may retain control over the instruments they have created."

California Government Code Section 54950 - the Ralph M. Brown Act.

After years of reviewing hundreds of Environmental Impact Assessments I can state I have yet to see a single EIR, EIA or EIS that meets the MINIMUM legally required. Frankly we're disgusted and angry with the typical avoidance of compliance with CEQA law and intent.

We're not alone. The Public, the California Bar Association and many environmental professionals decry the abysmal lack of environmental protection and the typical Agency use of CEQA loopholes to avoid disclosing potentially harmful environmental impacts.

As experts in many scientific fields related to environmental impacts and the law governing them, we are all too familiar with the typical agency standard for Environmental Review Documents which include huge doses of faulty or embarrassingly out-of-date science, environmental and biological illiteracy, twisted logic and intentionally risky legal conclusions to hide environmental damage. We find much CEQA avoidance originates in intentionally vague environmental review.

Because of the typical slipshod and ambiguous scientific and technical misconduct of Environmental Review preparation and to revive the rigor intended and expected from CEQA we have compiled -

1) a broad and specific factual basis of genuine environmental impacts; and

2) a list of standard questions to reveal the factual basis (or lack of a factual basis) of the document's conclusions.

Evidence Summaries are Inadequate.

"An expert who relies on a summary of data or facts, by definition relies upon the underlying data and the facts which form the basis for the summary." *Marsee v United States Tobacco*, 866 F.2d 319, 323 (10 Cir 1989)

This following larger than usual list of questions is needed because

1) Environmental Review is formal discourse, and
2) Agencies often do not deal in good faith and almost always raise a "Failure to Exhaust Administrative Remedies" defense when sued.

We find such a legal defense by an agency inherently bogus and poetically ironic since - 1) Courts hold agencies up as experts on environmental impacts (in spite of overwhelming evidence to the contrary) and 2) that the intent of CEQA is to prevent agencies from avoiding disclosure of environmental impacts.

It stands to reason that if an Agency is held up as expert AND the Agency failed to tell us about an impact - there is no other conclusion available except that they were either incompetent or intentionally hiding impacts. In either case the courts have held that agencies shall be legally liable for a failure to look for or disclose potential environmental harm.

We cannot ignore the potential for an agency to raise a "Failure to Exhaust Administrative Remedies" so in order to Exhaust our Administrative Remedies we are obligated to ask these questions about the fundamental basis of the conclusions asserted.

AGENCY EXPERTS - AREN'T

Governing Magazine Editorial "The fact of the matter is that many local governments do lack the expertise they need to administer land-use laws competently and fairly." Jonathon Walters, May 2000

"[Consulting Geologist Lew] Rosenberg also believes geologic information is not properly used by [Monterey] County Planning Department, which relies on its own staff to review reports rather than on registered geologists. 'The popular belief is that this would be too expensive,' Rosenberg said. 'However, if only one house or road were saved from damage, then using a geologist would more than pay for itself.'" -Herald Oct 15 1999 Front Page "Mapping out the Big One"

We intend to make it abundantly clear that it is irresponsible to consider Lead Agency staff or the EIR Authors as experts in any field of environmental impact or that they have really considered all environmental impacts until they can prove otherwise by answering each of our questions substantively, thoroughly, and meaningfully.

Responsible environmental review consultants and agency staff have welcomed our questions. Reckless environmental review consultants and agency staff have ignored our questions and facts increasing the risks of the Lead Agency losing litigation.

Our expertise is demonstrated by the inclusion of the best available science and specific facts all backed up by explicit citations relevant to the environmental impacts we raise. EIRs rarely provide such rigor.

CEQA OVERVIEW

A 1991 Association of (San Francisco) Bay Area Governments study found a "poor relationship between the environmental review and the ultimate project decision."

The California State Bar Association convened a CEQA Review Committee in 1994-1995. They concluded that the lack of standards for thresholds of significance was a problem stating:

"Many CEQA documents do not state [the thresholds used to make impact significance determinations]. If thresholds are not explicitly stated, it is difficult for the public to comment meaningfully on decisions to prepare a negative declaration instead of an EIR, or to comment on a particular significance determination."

The State Bar also found "the need for clarification regarding specificity, enforceability, feasibility, effectiveness and monitoring."

The U.S. EPA studied 1200 Environmental Assessments and Findings of No Significant Impact (FONSI)s and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

FACT BASED ANALYSIS OF BENEFITS, IMPACTS, MITIGATIONS & ALTERNATIVES

The following specific questions are intended to assist the public and decisionmakers by helping reveal the objective basis (or lack of) for the conclusions reached by your environmental document.

Superficial Science is Inadequate

The environmental document needs factual evidence to show how the benefits, or purposes, can be achieved, how the impacts were measured, how the mitigation benefit and Alternatives were evaluated. The document assumes that it is self evident that the benefits will be achieved, the Alternatives won't provide them, that impacts are insignificant and Mitigations are magical cures for everything. As is often said "The road ... is paved with good intentions."

However, the law requires conclusions be based on facts - not assumptions or opinions. Our California Supreme Court

wrote "[We can not] countenance a result that would require blind trust by the public." *Laurel Heights v UC*, 47 Cal.3d 376

CEQA Section 21080(e)

"Argument, SPECULATION, UNSUBSTANTIATED OPINION or narrative, evidence which is clearly inaccurate or erroneous ... is not substantial evidence. Substantial evidence shall include FACTS, reasonable assumptions BASED ON FACTS, and expert opinion SUPPORTED BY FACTS."

"[The EIR analysis] must be supported by references to specific scientific and empirical evidence." *Mountain Lion Coalition v. Calif Fish & Game* 1989, 263 Cal Rptr 104

"A prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decision making and informed public participation, thereby thwarting the statutory goals of the EIR process." *Kings County Farm Bureau v. Hanford* 1990

"A conclusionary statement 'unsupported by empirical or experimental data, scientific authorities, or explanatory information of any kind' not only fails to crystallize issues but 'affords no basis for a comparison of the problems involved with the proposed project and the difficulties involved in the alternatives.'" *People v. Kern County* 1974, 115 Cal Rptr 67 quoting *Silva v Lynn* 73 482 F.2d 1282, 1285

"The EIR must contain FACTS and analysis, not just the opinions of a public agency." -*Santiago Water District v Orange County* 1981, 173 Cal. Rptr 602 ***A detailed response is required when a comment raises a specific issue.** *Clearly v County of Stanislaus* (1981) 118 CA3d 348

The following describes how we can work on it together and how you can help.

For each Impact you will be asked to reveal all facts and reasoning used to arrive at conclusions of impact significance. As is often observed "We don't want to assume anything - because splitting apart the word 'Assume' makes an 'Ass,' U and Me."

The **CRITERIA NAMES LIST AND DEFINITIONS** is critical to objective decisions, so there are no hidden or ambiguously defined criteria or "add factoring." Each Impact requires at least one criteria to determine its significance. Some impacts may have many criteria. We need to know very specifically EVERY criteria which is used to arrive at EIR conclusions.

CRITERIA VALUES are critical since criteria names and descriptions alone are meaningless unless they have non-subjective definitions and explicit numeric values associated with them. For example "A moderate amount of runoff is expected" is wholly ambiguous and meaningless as criteria. However, "Impervious surface area will increase from 20 percent to 35 percent over the 3 acres and increase runoff by 5,000 gallons for every inch of rain" is an example of meaningfully quantified criteria.

The **MEASUREMENT METHODS** used are critical to know so a reviewer can understand how the foundational facts were measured, analyzed and used. When a single criteria is used it is critical to know exactly how it was measured and what instrument was used. Some examples of specifics - Was a mass spectrometer or an infrared spectrometer used? Which model Spectrometer was used (e.g. an HP 5987-A gas chromatograph/mass spectrometer); Which method was used (EPA 8270, ASTM E729-90 or an APHA test)? Did you use Allozyme or Microsatellite DNA analysis?

MEASUREMENT UNITS are critical to know so we know precisely what you mean by the measurements you describe and so the units don't change in the middle of the analysis. Which specific unit of measure are you using for each criteria (e.g. species per cubic centimeter, furlongs per fortnight, genes per cell etc.).

EXPLAIN FORMULAS USED

When two or more numeric criteria are used it is vital to understand how they are used together (i.e. are they added, multiplied or is some higher order function used such as a cosine).

UNCERTAINTY

There is nothing inherently wrong with uncertainty. Almost all public policy is made having some unknown information. What is inexcusable is not acknowledging uncertainty and failing to reveal it, estimate it or explain its meaning.

"A measurement result is complete only when accompanied by a quantitative statement of its uncertainty. The uncertainty is required in order to decide if the result is adequate for its intended purpose and to ascertain if it is consistent with other similar results." -National Institute of Standards and Technology (NIST)

US-EPA agrees with us and advocates that government agencies "Acknowledge Uncertainty" in their manual "Air Pollution and the Public: A Risk Communication Guide for State and Local Agencies", June 1991

There are at least Six Types of Uncertainty (adapted from a work by Dr. John Williams of Davis California) -

"Observational Uncertainty" arises from measurement and sampling errors.

For example when you repeatedly measure the same building and compare them you may get different results.

"Process Uncertainty" arises from natural variability. There is a developing consensus among scientists that the process uncertainty is large (Mangel et al. 1996)

"Model Uncertainty" reflects incomplete knowledge. For example ecological processes are so complicated, have so many variables, that no one understands them completely. Parameters for computer models are estimated from observed data so "estimation uncertainty" results.

Even simple risk assessment can have huge uncertainties. Eleven European governments established eleven different teams of their best scientists and engineers to assess the hazards from a small plant storing only a single hazardous chemical (ammonia). The eleven teams of world class experts analyzing this very simple system, disagreed with one another on fundamental points and varied in their assessments of the hazards by a factor of 25,000! (G. Tyler Miller, Living In the Environment 1998 p 278)

"Implementation Uncertainty" concerns "the extent to which management policies will be successfully implemented." This kind of uncertainty is especially large regarding EIR mitigation measures and attached as conditions to permits, because the agencies granting the permits seldom have the resources, and typically lack the motivation to check that the measures are being implemented properly. And then even if the measures are implemented properly, they may fail.

"Institutional uncertainty" involves the problems arising from interactions between individuals and groups composing the management process that effect implementation of stated conditions and risk mitigations.

ENVIRONMENTAL UNCERTAINTY INCREASING

"The natural world is a more uncertain place than most ecologists once believed it to be." Environmental Science; Morgan, Moran & Weirsm; W.C. Brown Pub. 1993

Please explain how you have addressed, considered and quantified EACH of these uncertainties for EACH criteria and EACH impact. We are not asking you to speculate, but to truthfully state the unknowns, their magnitude and reasonably foreseeable problems resulting from those unknowns. We expect you to follow with feasible solutions for contingency and failure.

* The QUANTIFIABLE BASELINE is critical to know so a reviewer can understand what starting point was used before project environmental impacts were added in.

Each Impact criteria must be measured from an existing Baseline using unambiguous units of measure and a replicable method. If an Impact criteria is not measured quantitatively (e.g. visual aesthetics) it is not a scientific or a legal fact - it is merely an opinion which is extremely distinct from a fact.

If a factual basis is avoided there must be a strong justification for avoiding quantitative measurements. We insist that quantitative evaluations be made or, if deemed impossible, that we be provided with a thorough and reasonable explanation of -

1. Why the baseline can not be quantified, and

2. the basis for each non-quantified conclusion.

THE AVERAGE - ISN'T

Mark Twain once observed "I never cross a river when all I know is its average depth is six inches."

If the phenomena examined is stable at two extremes (like daytime and nighttime temperatures), the average tells us nothing. As a former math and engineering teacher and a computer software scientist, let me try to explain two problems with data summarized without a complete description. The most common useful data description is which measure of central tendency "average" is used and how much the data varies from that.

When the term "average" is used we need to know precisely which kind of average is meant. There are at least eight (8) kinds of average or measures of central tendency: Midrange, Arithmetic Mean, Geometric Mean, Harmonic Mean, Logarithmic Mean, Weighted Mean, Median, and Mode. All seven usually give different, and sometimes wildly different, answers. If the type of average used is not disclosed the "average" claimed can be absolutely meaningless. If an inappropriate average is selected it may give highly misleading or even false conclusions. For example "Since half the people in the US are men and half are women the average adult has one ovary and

one testicle.", John Allen Paulos, Once upon a Number, 1998, Perseus Books.

If you explicitly spell out which kind of average is used and provide the data we don't mind the use of an average. However even an average is not complete without knowing the -

RANGE (Statistical) OR VARIANCE

The RANGE or VARIANCE for EACH statistic (Baseline, Impact, etc.) is also critical to know so a reviewer can understand how much the criteria varies. RANGE is independent and distinct from MARGIN OF ERROR. Range shows how much the phenomena can vary; Margin of Error shows how consistent the measurements are and how reliable the phenomenon is within that range.

When a average is used and extreme variations are hidden it is not possible to know what actual range of conditions could occur. So we need to know the extremes which can be expected from the activity.

A MARGIN of ERROR or a confidence level is needed for each claimed measurement, value, calculation and conclusion.

Every measurement has some error. We need to know the size of the errors. Imagine a child admits to you he only took three cookies. Asking the margin of error he responds "plus or minus Ten." This is alarmingly similar to information typically presented in Environmental studies.

When a margin of error is small, the measurement has high value. If the margin of error is large, the measurement has a lower worth. Americans are perhaps most familiar with margin of error often published with public opinion polls. (e.g. "Eighty percent of Americans support more environmental protection with a margin of error of plus or minus 4 percent.")

If you don't know the margin of error - we insist you estimate its approximate magnitude. Is it +/- 5 percent, 50 percent or 500 percent?

When combining two measurements - a new (probably additive, but potentially multiplicative) and inherently larger MARGIN of ERROR is created - and we want that amount stated separately.

Sometimes margins of error are not measured, but are opinions accurately called "estimates." Please state whether each MARGIN of ERROR is measured, calculated or an opinion.

Better yet than a margin of error is a probability distribution function (PDF). Unlike error bars which merely give a range in which a solution should fall, PDFs attach a likelihood to each possible value.

TRENDS OF HISTORICAL DATA is critical to know so a reviewer can understand

how the phenomena has varied over a time scale of ecosystem generations. (e.g. the previous 300 years to 30,000 years) to show whether there is a trend or a cycle. Variance only deals with recent short term fluctuations. Historical data can indicate whether there is an uptrend or a downtrend.

The MAXIMUM IMPACT CHANGE is critical to know so a reviewer can understand the most impact which this project could foreseeably cause. This is also extremely important in case the activity causes an impact larger than estimated by the Environmental Review. For many reasons environmental consultants often underestimate an environmental impact's magnitude. Knowing this number allows the public to have a quantifiable point at which the public objectively sue the consultant, the agency and the applicant for failing to adequately disclose the environmental impacts.

* The SIGNIFICANCE THRESHOLD LEVEL is critical to know so a reviewer can understand how Significance is measured and hold it up against the impact values. Ambiguous or unquantified significance thresholds are meaningless.

When an EIR claims an impact is less than significant, that value judgment is meaningless when there is no quantified significance threshold - so we can see if it is indeed less and by how much. See above where the California State Bar Association comments on this specific topic.

STRAW THAT BROKE THE CAMEL'S BACK
Significance thresholds are rarely a linear function. In some cases, when resources are extraordinarily abundant, it may take a large degree of environmental damage to reach a significance threshold.

However, when a situation is already at, or even beyond, a tolerance limit (e.g. a species population is endangered, a water supply emergency is officially declared, traffic is in gridlock, commercial parking is flooding into residential neighborhoods) - even the tiniest increase in environmental impact is significant. "The Straw that Broke the Camel's Back" is an excellent analogy to describe when the slightest increase can cause a significant impact.

One good example is California's Department of Transportation standard for a significant impact when an existing road or intersection is at gridlock (Level of Service "F") is the addition of a single vehicle trip. "It is the Department's position that the addition of even one peak hour trip in a LOS "F" environment represents a significant impact." (Cal-Trans letter dated Nov 18, 1997 to the Monterey County Planning Dept on the proposed September Ranch project.)

AMOUNTS vs PERCENTAGES
It is critical to know both absolute amounts AND percentages. Meaning can be hidden behind the failure to present both values. For example consider

the claim "66 percent of doctors support X." If you weren't told that only 3 doctors were asked, "66 percent of Doctors" was highly misleading when only two doctors supported the topic.

Similarly, cutting down 1 acre of flowers may not sound significant. But if you weren't told that there are only 2 acres of that flower left in the world making the loss of 1 acre - a worldwide 50 percent loss.

Both amounts and percentages must be stated so there is no mistake.

LEGAL THRESHOLDS LEVEL are critical to know so a reviewer can understand any legal limits that may already be in effect.

BOTH PHYSICAL AND LEGAL IMPACTS NEEDED
It is vital to distinguish between a number on paper (such as a legal threshold) and a real physical impact on the ground. It is the difference between the legal speed limit and how fast people really drive. We need to know both to insure no genuine impacts are overlooked. For example a project may have a legal entitlement to water, even when there is no physical water available. Or as one woman, from her hospital bed, decried the continued use of a nerve gas pesticide near her home "It gives us little comfort to know we're being poisoned legally!"

PHYSICAL THRESHOLDS
Legal thresholds for air pollution are often very different from known adverse health impacts. This is because air pollution impacts are usually set for Healthy, Male, Adults who are only about 20 percent of Americans. Thirty percent (30%) of ALL Americans have existing breathing problems. There can be genuine significant impacts on the 80 percent of the public who are not Healthy, Male, Adults.

LEGAL THRESHOLDS
Examples of state & federal laws which are potentially relevant to this activity include the California and Federal Endangered Species Acts, the US Clean Water Act, the US Clean Air Act, California's Proposition 65). Some laws have different legal limits for the same criteria. We want you to provide all of them.

NON-LINEAR RELATIONSHIPS are critical to understand so a reviewer can analyze those instances when even the tiniest tiny additional effect can "break the camel's back" and cause a potentially significant environmental impact. (See Significance Threshold Levels above)

CUMULATIVE, INCREMENTAL AND COMPOUNDING IMPACTS are critical to know so a reviewer can understand the approximate grand total of all of this specific impact from this and other projects, past, present and future.

ASSUMPTION SENSITIVITY can make huge differences in conclusions. Whenever assumptions are used for analysis it is critical that you analyze,

quantity and qualify how sensitive those assumptions are. For some assumptions the slightest variance can make a gigantic difference in the results. For example - when a poison is supposed to be a tiny percentage of a pesticide (e.g. 1 percent), but the real percentage varies from 0.5% to 1.5%, if that 50% increase in toxic content from what is expected is not disclosed and analyzed in the assumptions the conclusions could be substantially misleading.

RESOURCE LIMITS are critical to know so a reviewer can understand when the sustainable use of a resource is exceeded.

NATURAL RESOURCES ARE LIMITED & IMPORTANT

While it may seem obvious that human health and ecosystem health are important and that there are limits to natural resources it is appropriate to remember that they are actually explicitly found in laws.

California Environmental Quality Act - PUBLIC RESOURCES CODE 21000 et seq.
"The Legislature finds and declares as follows:
(d) THE CAPACITY OF THE ENVIRONMENT IS LIMITED, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached."

CALIFORNIA GOVERNMENT CODE SECTION 66478.2.
"The Legislature finds and declares that THE PUBLIC NATURAL RESOURCES OF THIS STATE ARE LIMITED IN QUANTITY that the population of this state has grown at a rapid rate and will continue to do so, thus increasing the need for utilization of public natural resources."

MONTEREY COUNTY GENERAL PLAN pg 136
"The current era of LIMITED RESOURCES has directed public attention toward resource conservation and resource recovery."

MONTEREY COUNTY GENERAL PLAN pg 8
"The NATURAL RESOURCES discussed in this plan can be characterized either as those which are unaffected by man or as those which may be DEPLETED OR DESTROYED improper management. Geography, climate, and geology, for example, are essentially unchanged by man's activities. The remaining categories of this section--MINERALS, SOILS, WATER, VEGETATION, WILDLIFE, OCEAN RESOURCES, ENVIRONMENTALLY SENSITIVE AREAS, ARCHAEOLOGICAL RESOURCES, AND ENERGY--MAY BE SIGNIFICANTLY ALTERED, OR EVEN DESTROYED THROUGH MISUSE."

1993 US Council on Environmental Quality Report Chapter 2: Water Quantity and Quality; Arizona and California.
"In water-deficit areas such as Arizona and California, large volumes of groundwater continue to be withdrawn to meet agricultural and municipal needs. BECAUSE OF LIMITED SUPPLIES, such withdrawals cannot be sustained indefinitely. Groundwater mining in the California San Joaquin Valley has

resulted in sediment compaction and land subsidence."

Important Interests:

Health and Safety Code Section 116270

"The Legislature finds and declares all of the following:

(a) Every citizen of California has the right to pure and safe drinking water."

California Fish & Game Code 1600

"The protection and conservation of the fish and wildlife resources of this state are hereby declared to be of utmost public interest."

California Fish & Game Code 2014. (a) "It is the policy of this state to conserve its natural resources and to prevent the willful or negligent destruction of birds, mammals, fish, reptiles, or amphibians."

California Fish & Game Code 2052

"The Legislature further finds and declares that it is the policy of the state to conserve, protect, restore, and enhance any endangered species or any threatened species and its habitat ..."

California Fish & Game Code 2781.

The people of California find and declare that wildlife and fisheries conservation is in the public interest and that it is necessary to keep certain lands in open space and natural condition to protect significant environmental values of wildlife and native plant habitat, riparian and wetland areas, native oak woodlands, and other open-space lands, and to provide opportunities for the people of California to appreciate and visit natural environments and enjoy California's unique and varied fish and wildlife resources.

16 U.S.C. 1531 Endangered Species Act (FESA)
Sec. 2. (a) Findings.--The Congress finds and declares that--
(1) various species of fish, wildlife, and plants in the United States have been rendered extinct as a consequence of economic growth and development untempered by adequate concern and conservation;
(2) other species of fish, wildlife, and plants have been so depleted in numbers that they are in danger of or threatened with extinction;
(3) these species of fish, wildlife, and plants are of aesthetic, ecological, educational, historical, recreational, and scientific value to the Nation and its people; (emphasis added)

California Public Resources Code 4512. Findings and declarations.

(a) The Legislature hereby finds and declares that the forest resources and timberlands of the state are among the most valuable of the natural resources of the state and that there is great concern throughout the state relating to their utilization, restoration, and protection.

As the Myth of SuperAbundance falls to pieces, developers now raise the Myth of Technological Supremacy - the belief that even though resources are finite, we can still develop and pollute unabated because science and technology will always provide ways of solving the problems of pollution and resource depletion.

"However, if science alone were as successful as the myth suggests, then the human race would not be in the throes of a crisis of pollution, population, industrialization, and resource depletion." Courtesy "Frontier Ethics and Lifeboat Ethics" by K.S. Shrader-Frechette, Boxwood Press

EXPERT QUALIFICATIONS are critical to know so a reviewer can understand whether an expert is genuinely trained to offer opinions on the specific impact at issue - or merely familiar with the general field. It is helpful to cite any peer reviewed and validly published papers on the specific impact by the expert. Agency planning staff are rarely specifically or even generally trained to make decisions on environmental issues. Yet Courts give them wholly undue deference when they make conclusions.

IRRELEVANT EXPERTISE

For example Forestry professionals are often used to provide value judgments on the significance of ecological impacts - even though foresters rarely have any training in ecology or even basic biology. Forester training has no goal or information resembling protecting a healthy ecosystem. They are only trained to determine what makes good lumber. Their implied "expertise" is almost completely meaningless to any scientific judgments made about ecosystem health.

What comes as a shock to many is how biologists and botanists have little if any training in ecology or ecosystems. Interdependence is perhaps the most important concept for ecosystem health, yet the word does not even appear in most major Biology text books. Because most biologists are only trained to deal with a single species at a time, unless they receive special training in ecosystems and about the particular ecosystem they are dealing with - they are normally inadequate to make any ecological judgements.

GRAPHS

Please use graphs and time lines wherever possible.

MUST IDENTIFY FEASIBLE MITIGATION

By law, an environmental impact report must identify and examine significant environmental effects of a proposed project, feasible mitigation measures, unavoidable significant effects, significant irreversible environmental changes, and alternatives to the proposed action. West's Ann.Cal.Pub.Res.Code 21061, 21100.

"The National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) require an intensive environmental review of projects that may adversely affect a Federally listed species. However, project proponents are not required to avoid impacts to non-listed species, and proposed mitigation measures are frequently not adequately implemented."
-US-Fish & Wildlife Service in Federal Register 1996

MUST IMPLEMENT FEASIBLE MITIGATION

CEQA requires agencies to implement feasible mitigation measures or alternatives identified in the EIR. (sec. 21002, 21081; Sierra Club v. State Bd. of Forestry (1994) 7 Cal.4th 1215, 1233.)

MEANINGFUL MITIGATION NEEDS MEASURABLE PERFORMANCE CRITERIA

Mitigation is meaningless unless it has measurable performance criteria. Mitigation performance criteria must take the form - certain measurable events will occur by a specific date - or specific penalties must occur.

MITIGATION ADEQUACY BY TYPE

There are two types of mitigation adequacy and inadequacy - legal and physical.

ILLEGALLY INADEQUATE MITIGATIONS

According to the CEQA Deskbook 1996 (Bass, Herson, Bogdan pg 100 "Cited as an authoritative Source by the California Courts.") -

All Mitigations are legally inadequate which involve: "Conducting Surveys", "Submitting for Review", "Consulting with ...", "Coordinating with...", Informing, Encouraging or discouraging, Facilitating, "Strive to..."

POTENTIALLY INADEQUATE MITIGATIONS

All Mitigations are potentially legally inadequate which involve "Provide Funding for...", "Hire Staff", "Monitor or Report", Complying with existing regulations. Id.

ADEQUATE MITIGATIONS

The only Mitigations which are potentially legally adequate are those which sufficiently Avoid, Minimize, Reduce, Rectify over Time, and Compensate. Id.

AVOIDANCE MITIGATION is important to wholly avoid an impact.

We do not accept any mitigation other than avoidance. We find the concept of mitigation as repugnant as a rapist sending flowers to their victim.

California law agrees with us regarding Coastal Zone impacts on Environmentally Sensitive Habitat Area (ESHA) including habitat for listed species and wetlands as the Coastal Act prohibits mitigation for impacts on these endangered environmental systems.

Inability to determine mitigation effectiveness means the Mitigations are not fully enforceable due to vagueness. CEQA requires Mitigations to be "fully enforceable" 21081.6(2)(b).

If you use the term "mitigated" or "mitigated to a less than significant level" you need to explicitly define those terms or they are meaningless due to overly broad ambiguity.

IMPACT INVERSE MIGHT PROVIDE MITIGATION

You will be asked to provide the reverse of each impact as Mitigation.

While this does not always work, often reversing an impact can provide mitigation. For example: Paving a forested area causes impacts. The reverse, Dedicating currently paved acreage for forest restoration, might be Mitigation.

ENDANGERED SPECIES IMPACT CRITERIA

To examine whether an activity impacts a listed species, first one must determine if the species potentially visits or uses the site. If so then you must examine if the species would be affected by the activity.

US Fish & Wildlife Service use three criteria for site assessment protocol determination for a species listed under the Endangered Species Act:

1. Is any of the project well within the range of the species?
2. Is any of the project within five miles of a recent observation?
3. Is any habitat consistent with the species known habitat?
4. Please provide a map of the Action Area as defined by the Federal ESA.
(For these three questions please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16,4-17.)
5. Please provide a map of the areas directly affected by the project.
6. Please provide a map of the areas indirectly affected by the project.

LOSSES OF HABITAT OR POPULATIONS

For each listed species, in addition to the harm to individuals, you will be asked to identify all known and suspected major and minor threats to the species (examples include: habitat loss, habitat destruction, habitat fragmentation, habitat modification or habitat restriction caused by residential, commercial, recreational, agricultural development activities; commercial hunting and poaching; overfishing; predator and pest control; predators losing their primary food source and increasing their predation of the listed species; extremes of high or low water, introduction of nonnative (exotic) species, increased sedimentation from grazing, pesticide runoff, sewage runoff, groundwater overdrafting, increased aquatic growth causing water anoxia, elevated water temperatures which could lead to stress, poor condition and poor survival in aquatic species, changes in food supply, prevention of immigration, use of chlorinated hydrocarbons, toxins in general, potential oil spills, off-road vehicles, shooting, existence of power lines, presence of domestic pets, loss of tall snags for roosting).

HOST PLANT DISTURBANCE CAN BE ESA TAKE

"The disturbance of this species host plant may be considered to be take of the species and a violation of Section 9 of the [US-Endangered Species Act]." US-FWS letter to Monterey County Dec 10 1997 discussing Smith's Blue Butterfly and its buckwheat host plant.

HABITAT ENHANCEMENT CAN BE ESA TAKE

"...habitat enhancement activities for Smith's Blue butterfly, while intended to benefit the species, and also result in [ESA] take." US-FWS letter to Monterey County Dec 10 1997 discussing Smith's Blue Butterfly.

COASTAL ACT ESA PROTECTION

Each federal or state listed species and their habitat are protected by the Calif. Coastal Act (as Environmentally Sensitive Habitat Area "ESHA") when they live in the Coastal Zone. Each listed species is also protected against "take" by the ESA.

* LOSS OF A SINGLE INDIVIDUAL OF A LISTED SPECIES IS SIGNIFICANT

The loss of a single individual of a listed species must have a Finding of Significant Impact under CEQA Section 15065. *Mira Monte Homeowners v. San Buenaventura Cty. ETC.* 165 Cal.App.3d 357 Cite as 212 Cal.Rptr. 127 (Cal.App.2 Dist. 1985)

* The loss of as little as a quarter of an acre of habitat a single individual of a listed species must have a Finding of Significant Impact under CEQA Section 15065. *Mira Monte Homeowners v. San Buenaventura Cty. ETC.* 165 Cal.App.3d 357 Cite as 212 Cal.Rptr. 127 (Cal.App.2 Dist. 1985)

CITATIONS

1) When citing a reference document, along with a quote from the reference please cite the exact document (and where it can be found), page, paragraph and specific sentences so there is no ambiguity.

If you think you've already answered a question, similarly, please cite the exact page, paragraph and SPECIFIC SENTENCES so there is no ambiguity.

2) A 1999 study of 61,594 peer reviewed articles in 184 "high profile" journals found that in only 327 articles (0.53 percent) did an author acknowledge a potential for financial gain. In 70 percent of the journals, not a single author reported a financial tie.

Yet a 1998 study showed that some 34 percent of all Boston area authors who published papers in 14 major journals during 1992 had financial stakes in the outcome of the articles - even though none disclosed those stakes in the articles. (Science News Feb 6 1999, Vol 155 pg 91).

* For every report cited please state whether the author reported that s/he had NO potential financial stake in the outcome of the paper.

NOTICE

It is our opinion that it is not possible to make an adequate or informed decision lacking the basic facts requested. Concluding something without basic facts is similar to trying to add one number and an unknown number. It doesn't matter how certain you are of the known number, if the unknown number can vary by a magnitude or more (say between one and one thousand), any result or conclusion from adding the two is at least wildly inaccurate

and more likely meaningless.

If you disagree and fail to answer any question directly or fail to provide any of the quantitative analysis, please clearly explain the method you used and the threshold of information you need and used to make each benefit, significance and mitigation decision and why you avoided using a quantitative measure.

* 1 - INADEQUATE AND OUT OF DATE GENERAL PLAN.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Inadequate and Out of Date General Plan.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The California Attorney General's office found that Monterey County's General Plan may be seriously outdated and needs adoption of a "comprehensive general plan update." AG letter to Monterey County August 11, 2000

"The [Monterey County] General Plan is out of date." Jim Colangelo, head of Monterey County Environmental Resource Policy, and in charge of Monterey County General Plan Update - verbally and on powerpoint presentation to public meeting for General Plan Update, Jun 11, 2001 at MPC lecture forum 103 7:00pm

"As of March 1994, the records maintained by the California Dept. of Housing and Community Development indicated that only 42 percent of General Plans were in compliance with the law, measured solely on the basis of adequacy of the housing element. If the adequacy of the other elements was also taken into account, the level of compliance would be even lower." -Understanding Development Regulations, Solano Press 1996 p 36)

GENERAL GENERAL-PLAN INADEQUACY

The cities of Carmel, Pacific Grove and many others do not address hazardous wastes. Monterey County Draft Haz Waste Mgmt Plan p 10-10

Recycling vs Garbage

In 1989 AB 939 passed mandating all jurisdictions (each city and county) to reduce waste stream by 50% by the year 2000 or face fines of \$10,000 per day. In spite of the 12 year phase in - almost no city or county in California has complied with this law.

Monterey COUNTY GENERAL PLAN INADEQUACY Changed Circumstances since 1984 GP approval and not incorporated into the Monterey County General Plan:

POPULATION:

AMBAG population forecast changed 4 times and now has disclaimer on use.

LUP states "there will be no major reduction in Fort Ord operations."; Fort Ord Closed

WATER:
LUP states "there will be some increase in water supply."; yet, water supply has decreased.
Water supply for the Monterey Peninsula area became legally constrained with (SWRCB order 95-10).

Carmel River Dam approval voided by the court.
Salinas Aquifer overpumping is now 40,000 to 50,000 acre feet per year more than recharged by rain.
Saltwater Intrusion has Increased.

TRAFFIC:
LOS "F" on Hwy 1 @ CVR
LOS "F" on Hwy 1 @ Hwy 68
LOS "F" on Hwy 68 to PG
LUP states HCF "will be constructed";
HCF approval voided by court in 1998

BIOTA:
LUP states "there will be no major change in environmental regulations"; yet The Monterey Bay National Marine Sanctuary was created since the General Plan was adopted and it makes no mention of the Sanctuary.

Many wildlife species have been formally listed under the Federal and State Endangered Species acts since the General Plan was approved. Although the General Plan has been amended regularly to allow development, none of the newly listed species or their habitat have been acknowledged. The General Plan is out of date because it does not recognize the potential impacts to those species, their thousands of acres of habitat and the protection they need.

Just a few of the species listed since the General Plan was adopted include: West Coast Steelhead (*Oncorhynchus mykiss*, or O. mykiss) 1997, the California Red-Legged Frog (*Rana aurora draytonii*) 1996, the Snowy plover, Gowen Cypress, Yaden's Piperia, Condors have been reintroduced, Marbled Murrelets have been found nesting, Northern Spotted Owls, Great gray owl, Elf Owls, Smith's Blue Butterfly.

The California Red-Legged Frog and the West Coast Steelhead (*Oncorhynchus mykiss*) are both significantly harmed by overpumping of the Carmel River causing its dewatering. The US-Fish & Wildlife Service (FWS) has warned that dewatering the Carmel River is potentially a take of the Frog (CRLF) under the Endangered Species Act. The US-National Marine Fisheries Service has concluded "steelhead are continuing to be taken every year due to the overpumping."

Pinus Radiata (Monterey pine) was listed by the United Nations FAO in 1986 as an Endangered tree; after that the species and its habitat became threatened dramatically threatened by Pine Pitch Canker (*Fusarium*

subglutinans). At the same time the Pebble Beach Company proposes to destroy hundreds of acres (more than a square mile) of the healthiest native *Pinus Radiata* forest remaining. The General Plan does not acknowledge this or provide any protection for the tree or its habitat - in fact the County takes pains to avoid any protection for the tree.

Five (5) plants are newly listed under the Endangered Species Act.

The Bolsa Chica case has revised Coastal Zone protection. Wetlands and ESHA are now wholly protected by the Coastal Act.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Inadequate and Out of Date General Plan.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 2 - OFFSITE LOCATION ALTERNATIVE - OBTAIN EXISTING GOLF COURSE.**

The Document appears to have ignored this potentially feasible Alternative. Please carefully analyze and disclose the potential benefits of Offsite Location Alternative - Obtain Existing Golf Course.

An offsite alternative is one that does not involve the activity on the proposed land. In some cases it may involve examining land out side the area. For example when a transportation agency's proposal to dump dirt into the ocean, one offsite alternative would be to remove the dirt to areas away from the watersheds which drain into the ocean.

The DEIR refuses to analyze an existing offsite golf course. It only mentions "new" golf course sites.

An existing offsite golf course would complement the existing PBC golf courses just as the Old Del Monte at the Hyatt in Monterey does.

The "question of water" is bogus as PBC has just asked for an received an expansion of the "benefitted properties" from those owned now to any that they might purchase in the future inside Del Monte Forest. The water board made it clear in 2004 that the only hindrance to expanding the "benefitted properties" to properties outside the forest was that they would have to prepare an EIR.

* OFFSITE MITIGATION - The project proposes offsite mitigation for Monterey pine forest ecosystem destruction.

* The applicant uses offsite mitigation for Golf course tournaments in Pebble Beach. For traffic and parking mitigation they bus people in from as far away as Ft. Ord. Those people are "complementing" their golf courses.

* The applicant already owns and operates one offsite Golf Course - at the Hyatt in Monterey.

So we insist that Offsite Golf Courses be properly analyzed as a viable Alternative. There are at least two general

methods with NO potentially significant ENVIRONMENTAL IMPACTs - purchase or lease.

Ft. Ord's Black Horse and Bayonet Golf Courses are closer to the proposed project site (with colossal environmental impacts) than the Ft. Ord bussing the applicant uses for event traffic and parking mitigation.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average

amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

*** 3 - NO ENVIRONMENTAL IMPACTS ALTERNATIVE.**

The Document appears to have ignored this potentially feasible Alternative. Please carefully analyze and disclose the potential benefits of No Environmental Impacts Alternative.

This alternative provides a maximum of zero potential environmental harm including no loss of wildland or wildlife, zero increase in traffic or air pollution, no increase in water use.

The only way to unarguably realize this alternative is to provide for actions that clearly increase wildland and wildlife, clearly decreases traffic and air pollution, and clearly decreases water use.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is

not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

K. BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

L. COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 4 - MINIMUM NON-TAKING ALTERNATE.

The Document appears to have ignored this potentially feasible Alternative. Please carefully analyze and disclose the potential benefits of Minimum Non-Taking Alternate.

The US Supreme Court has consistently held that at least 50% and sometimes as much as 95%, of a parcel's economic worth can be zoned away or denied development without causing a "taking."

Keeping that 95% reduction in zoning in mind, please prepare the smallest development alternative possible without causing a taking.

Property Rights vs Community Rights - Key U.S. Supreme Court Cases

1) ZONING IS CONSTITUTIONAL

Village of Euclid v. Ambler Realty Co. (1926)

This case brought (unsuccessfully) by the real estate industry established the constitutionality of zoning ordinances.

2) MERELY DIMINISHING THE VALUE OF PROPERTY BY 50 PERCENT IS INSUFFICIENT TO DEMONSTRATE A TAKING - THUS CONSTITUTIONAL

Concrete Pipe, Inc. v. Construction Laborers Pension Trust (1993)

In this post-Lucas case, Supreme Court returns to traditional Penn

Central three-part formula and reaffirms that mere diminution in property value (in this instance, nearly 50%) does not amount to a taking. The Court expressly distinguished the generally applicable three-part test from the limited Lucas test, which applies only in cases involving the complete "destruction" of the economically viable use of real property. The Court held that Concrete Pipe's required 46% pay-out to withdraw from a multi-employer pension plan was not a taking. The nearly 50% property diminution fell far short of the complete destruction of economically viable use of the property.

3) DETERMINED THAT A 100% ECONOMIC LOSS EQUALS A TAKING, BUT SOMETIMES 95% IS NOT A TAKING.

Lucas V. South Carolina Coastal Council (1992)

The rule: A regulation amounts to a taking if it removes all economically viable use of property... Lucas is a narrow holding because very few regulations remove all economically viable use of property.

"It is true that in at least some cases the landowner with 95% loss will get nothing, while the landowner with total loss will recover in full. But that occasional result is no more strange than the gross disparity between the landowner whose premises are taken for a highway (who recovers in full) and the landowner whose property is reduced to 5% of its former value by the highway (who recovers nothing). Takings law is full of these all-or-nothing situations."

The exception:... unless the regulation is consistent with the state's traditional (common) law of nuisance and property.

In my opinion this means that government may prohibit any development where it would be a nuisance or a health or safety hazard.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 5 - HANDS-OFF MANAGEMENT ALTERNATIVE.

The Document appears to have ignored this potentially feasible Alternative.

Please carefully analyze and disclose the potential benefits of Hands-Off Management Alternative.

This "Leave-It-Alone" alternative normally provides the absolute fewest and smallest of environmental impacts. In some cases where ongoing management provides continuing environmental impacts such as noise, air or water pollution the Hands-Off alternative provides even fewer and smaller impacts than the "No-Project" alternative.

This is the No-Management Alternative. This alternative recognizes that there is little, if any, evidence that human management of a natural ecosystem has ever improved all of its ecological values as well as when nature is left to itself. This is distinct from the clean up management of an area that has been destroyed by human activities including damming, paving, mining, logging, and hazardous waste dumping.

Conservation and stewardship are as ethically meaningless to environmentalists just as abolitionists scorned "kindly slavery." Roderick Nash, The Rights of Nature, 1989 DEQ

We insist this Management Alternative be evaluated for Monterey pine forest ecosystem protection.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the

studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

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* 6 - CARRYING CAPACITY ALTERNATIVE.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Carrying Capacity Alternative.

Restrict the project so that use by the Maximum Persons at One Time (PAOT) never exceeds the resources available.

Carrying Capacity is "the number of individuals of a given species that can be sustained indefinitely in a given area." Miller, Living in The Environment pg 206, 1998

Carrying Capacity is "the maximum population that a given area's resources can sustain indefinitely." (p 25) Carrying Capacity is "the population size that the total resources of the habitat can support on a sustained basis." (p 91) Environmental Science (textbook) ; Morgan, Moran & Weirsma; W.C. Brown Pub. 1993

"The Carrying Capacity of a specific area is the number of individuals of a species that can survive in that area over time. In most populations, four broad categories of factors interact to set the carrying capacity for a population. These factors are: 1) the availability of raw materials, 2) the availability of energy, 3) the accumulation of waste and their means of disposal, and 4) interactions among organisms." Environmental Science (textbook) Enger & Smith, 1995

The above two define carrying capacity for a single population.
The following is a definition and a rule of thumb for carrying capacity of an area.

The Carrying Capacity of a specific area is the number of individuals of each and every species that can survive in that area over time.
Because of constraints including food, energy and habitat area if one species increases - some other species must decline.

Carrying Capacity is not a rigid unvarying number, it can vary by a small or a medium amount. It can vary downward during times of stress such as drought. The problem for Planners is that for many reasons politicians tend to vote of maximum numbers of human population. So even when Planners set a maximum human population for an area, politicians will vote to allow population to reach that number. This becomes a problem when the stress (i.e. drought) arrives. In such a case the stress can cause annoyances or illnesses and even deaths.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

* 7 - NO SIGNIFICANT CUMULATIVE IMPACTS ALTERNATIVE.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
No Significant Cumulative Impacts Alternative.

Restrict the proposed project so that use by the Maximum Persons at One Time (PAOT) does not cause any cumulative environmental impacts.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 8 - NO CONFLICTS WITH EXISTING LAWS AND ZONING ALTERNATIVE.

The Document appears to have ignored this potentially feasible Alternative.

Please carefully analyze and disclose the potential benefits of No Conflicts with Existing Laws and Zoning Alternative.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the

studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 9 - EXCHANGING SOME RESOURCE PROTECTION FOR OTHERS DESTRUCTION.

Protecting Other Resources To Allow Destruction is false mitigation.

It is a perfect example of mitigation causing additional impacts.

It is sometimes called Hostage Mitigation. It is analogous to a developer threatening "If you allow me to rape your daughter - I'll leave your wife alone." or "If you allow me to take your television - you can keep your car."

Both are destructive.

THIS project proposes this kind of mitigation for Monterey pine forest ecosystems.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:

Exchanging Some Resource Protection for Others Destruction.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure: Exchanging Some Resource Protection for Others Destruction. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure: Exchanging Some Resource Protection for Others Destruction. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Exchanging Some Resource Protection for Others Destruction.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: Exchanging Some Resource Protection for Others Destruction.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: Exchanging Some Resource Protection for Others Destruction.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 10 - MONETARY FINE MUST EXCEED COST OF BUSINESS.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Monetary Fine Must Exceed Cost of Business.

When an environmental crime provides large profits yet has tiny fines if caught, there is no disincentive to doing the crime.

Only when the penalty cost of getting caught is certain jail time or exceeds the potential profits by a magnitude does a deterrent occur.

Please estimate the potential profits in dollars if each mitigation is not performed.

* 11 - SILTATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Siltation.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Siltation is distinct from Sedimentation. Siltation is the presence of material before running water settles. Sedimentation is that material which "settles to the bottom of a liquid."

"Turbid waters, by reducing light penetration can also reduce the population of photosynthetic microorganisms which are a primary food source in the aquatic food chain." The California Water Atlas, California Office of Planning and Research, 1978-1979, ISBN 913232-68-8

Siltation of streams harm fish and other aquatic life by reducing visibility and harming their breathing. How would you like to breathe air full of silt?

Siltation can reduce photosynthesis by blocking light to the stream and its bed.

Please use as impact measuring criteria: weight or mass, concentration, and area.

The lower ninety (90) miles of the Salinas River (Hydro Unit # 309.100)

is on the US EPA's CWA 303(d) list for Sedimentation/Siltation contamination exceeding TMDL limits. The pollution comes from Agriculture, Irrigated Crop production, Agriculture-storm runoff, Agriculture-irrigation tailwater, Agriculture Return flows, Roads, Construction, Channel Erosion, and non-point source pollution.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Siltation.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 12 - SILTATION EFFECTS ON THE RED-LEGGED FROG.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of

Siltation effects on the Red-legged Frog.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Siltation effects on the Red-legged Frog.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 13 - SEDIMENTATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Sedimentation.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Siltation is distinct from Sedimentation. Siltation is the presence of

material before running water settles. Sedimentation is that material which "settles to the bottom of a liquid."

Sediment is deposited material which "can blanket fish spawning gravels, smother aquatic organisms that dwell on the bottom of streambeds, and interfere with respiration of fish eggs." The California Water Atlas, California Office of Planning and Research, 1978-1979, ISBN 913232-68-8

"In addition high loads of sediment increase costs of water treatment and can interfere with irrigation by leaving a hard layer of sediment on the topsoil which seedlings may have difficulty breaking through." Id. p 94

Dams fill with silt, rocks and sediment. The original Carmel River Dam was built in 1888. The San Clemente Dam was built in 1921 with a capacity of 2154 acre feet. It is now filled to the brim with fine silts, rocks and sediments.

The Los Padres Dam was built in 1939? with a capacity of 3100 acre feet. About half its capacity has been lost as it filled with silt, rocks and sediment leaving only about 2100 acre feet.

The Rindge Dam on Malibu Creek in Los Angeles County is entirely filled with silt.

Please use as impact measuring criteria: weight or mass, concentration, depth and area.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Sedimentation.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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31. Please quantify all potential CUMULATIVE impacts related to this one.
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* 14 - SEWER SYSTEMS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Sewer Systems.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Environmental Impact Statements on highways and sewage treatment plants seldom evaluate the resulting impact on urban growth patterns. These secondary effects may, however, be more damaging than the primary effects. The second form of shortsightedness is the tendency to consider

only changes in the physical environment and to ignore changes in the social environment. Yet impacts on pollution patterns or community behavioral patterns may affect the quality of the human environment much more than impacts on air or solid waste."

U.S. EPA, letter to the President's Council of Environmental Quality
21 December, 1971

The US has some one million miles in its sewage system network designed to carry 50 trillion gallons per day. In 2004 a report warned this aging system is failing and threatening public health, our drinking water supplies and imperiled species.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Sewer Systems.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 15 - INCREASED SEWERAGE DEMAND.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Increased Sewerage Demand.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

According to AMBAG's 1998 population forecast, Carmel Valley is at or beyond septic tank capacity now. Because of the saturation, Carmel river water contact is prohibited during flooding because of the risk of infection.

According to AMBAG's 1998 Population forecast - Monterey County Environmental Health Dept. found the following areas are "at, or approaching, septic systems carrying capacity:"
Bolsa Knolls area north of Salinas (CT 105.01 & CT 1)
Carmel Valley Village (CT 110)
Mid-Carmel Valley area (CT 116 & CT 100)

"In the following areas there are blanket restrictions on both further subdivisions and second units due to nitrate contamination potential:
Carmel Valley Village (CT 110)
Mid-Carmel Valley area (CT 116 & CT 100)
Prunedale Area (Ct 103.01)

Please use as impact measuring criteria: weight or mass and concentration.

Restaurants in Carmel Valley generate 1000 gallons of sewage per day plus 30 gallons per restaurant seat. (An 80 seat restaurant would generate 3,400 gallons of sewage per day.) Bernardus Negative Declaration 1999

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Increased Sewerage Demand.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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46. Please provide the reverse of this impact as Mitigation.

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-

* 16 - SEWAGE CAPACITY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Sewage Capacity.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Decomposition of the daily wastes of just one person requires all the dissolved oxygen in 9,000 liters (2,200 gallons) of water." Environmental Science; Morgan, Moran & Weirsma; W.C. Brown Pub. 1993

What is the currently permitted volume of waste discharge?
What is the average daily waste flow into the system?
What is the peak daily waste flow into the system?

Please graph the sewage capacity needed through the construction phase of the project.

Please graph the sewage capacity available and permitted through the construction phase of the project.

AMBAG's Executive Director Nick Papadakis stated: ... "The triparty agreement that you are referring to does call for the AMBAG forecast to be used by the Air District when they're preparing Air Quality Plans.
that is correct. its also required under the Consistency determination between air quality and the sewer plant sizing.

"When EPA grants money to an agency to construct a sewer facility that construction and sizing of that facility must be consistent with the air quality plan. Therefore the triparty agreement calls for every forecast to use the air quality plan to ensure sizing. And that's the connection."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Sewage Capacity.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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46. Please provide the reverse of this impact as Mitigation.

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* 17 - SEWAGE POLLUTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Sewage Pollution.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Sewage can contain industrial pollution including radioactive and highly toxic chemicals.

Sewer systems are almost never separated into residential and commercial lines allowing commercial and industrial chemicals into sewage plants as well as household wastes.

Cancer victims taking chemotherapy drugs excrete the radiological waste into residential and hospital toilets.

Households use powerful lyes to clean toilets.

Restaurants discharge huge amounts of grease into sewage lines.

"A person who takes an antibacterial drug excretes much of the dose intact (SN:3/21/98, p 187). Contaminating rivers or soil, the persistent drug kills many of the microbes it encounters but leaves behind those that can resist it (SN: 6/5/99, p 356)." SN Jan 1, 2000, p 5

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Sewage Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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46. Please provide the reverse of this impact as Mitigation.

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* 18 - INCREASED EFFLUENT DISCHARGE TO MARINE SANCTUARY.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Increased Effluent Discharge to Marine Sanctuary.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Increased Effluent Discharge to Marine Sanctuary.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 19 - SEWERAGE INTERRUPTIONS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Sewerage Interruptions.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Sewerage Interruptions.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 20 - SEWERAGE OVERFLOWS AT THE CAWD PLANT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Sewerage Overflows at the CAWD Plant.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Mismanagement at the Carmel Area Wastewater District (CAWD) has caused

several sewage overflows into the Carmel River and the Carmel Bay and resulted in orders to cease and desist.

Please use as impact measuring criteria: number of occurrences and weight or mass of each occurrence.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Sewerage Overflows at the CAWD Plant.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 21 - SEPARATE SEWER LINES FOR RESIDENTIAL AND COMMERCIAL.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of

Separate Sewer Lines for Residential and Commercial.

Residential, commercial and industrial sewage are all combined in a single line and are treated identically. There are no separate treatment facilities handling the pollutants occurring from industrial wastewater, specifically heavy metals and pesticides.

This contamination prevents the use of the sewage solids in agriculture.

Please evaluate separate sewer lines and treatment for Residential, commercial and industrial sewage.

This Alternative does not require any non-off-the shelf technology.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 22 - UNSTABLE SLOPES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Unstable Slopes.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

All sloping ground tends to flatten when exposed to rain or wind or seismic activity.

All sloping ground has a maximum angle beyond which it will easily erode. That slope is called the angle of repose.

The steeper the angle of repose the greater the amount of landsliding during rains, winds or seismic events.

Please use as impact measuring criteria: angle of repose of varying soils, angle of allowable slope cuts, number of cuts and mapped area of activity.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Unstable Slopes.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 23 - INCREASED EXPOSURE TO SEISMIC LANDSLIDING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Increased Exposure to Seismic Landsliding.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Monterey County had an opportunity to be a testing ground for extensive mapping by the US Geological Survey in the 1970's, according to John Tinsley, a research geologist for the USGS in Menlo Park. But the county turned the offer down, Tinsley said, 'because the rock-ribbed Board of Supervisors didn't want anybody telling them what they could do with their property.'

San Mateo County accepted the offer and reaped the benefits as the first county to control landslide hazards by doing a slope stability map. Based on that mapping, San Mateo County limited development on unstable slopes, sometimes only allowing one house per 40 acres."

Since the County's official maps were prepared in 1975 seismologist have learned that "shaking is the most severe parallel to faults, not in a concentric pattern as had been previously thought, and that landslides cause more damage than earthquakes in Monterey County." -Herald Oct 15 1999 Front Page "Mapping out the Big One"

The mansions proposed for the upper parts of Jeffers' Forest (PQR) are above a pristine stream and watershed. They will increase erosion into that forest and subject buildings to increased Seismic Landsliding.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Increased Exposure to Seismic Landsliding.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 24 - EARTHQUAKE GROUND RUPTURE FROM ACTIVE ONSITE FAULTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Earthquake Ground Rupture from Active Onsite Faults.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Earthquakes can cause the ground to rupture and pull buildings and roads apart causing their collapse.

The location of ground ruptures is not completely predictable.

In 1976 a quarter of a million people were killed by an earthquake in Tang-shan China.

Monterey County prohibits any structure habitable or inhabitable within 50 feet on either side of a fault line.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Earthquake Ground Rupture from Active Onsite Faults.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 25 - SEISMIC SHAKING IMPACTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Seismic Shaking Impacts.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Seismic Shaking can cause ground movement, both temporary and permanent, landsliding, rockfalls and liquefaction.

"Monterey County had an opportunity to be a testing ground for extensive mapping by the US Geological Survey in the 1970's, according to John Tinsley, a research geologist for the USGS in Menlo Park. But the county turned the offer down, Tinsley said, 'because the rock-ribbed Board of Supervisors didn't want anybody telling them what they could do with their property.'

San Mateo County accepted the offer and reaped the benefits as the first county to control landslide hazards by doing a slope stability map. Based on that mapping, San Mateo County limited development on unstable slopes, sometimes only allowing one house per 40 acres." Herald Oct 15 1999 Front Page

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Seismic Shaking Impacts.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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11. If an average is used, please state which kind of average.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 26 - SEISMIC LOADING FROM A MAXIMUM CREDIBLE EARTHQUAKE (MCE).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Seismic Loading from a Maximum Credible Earthquake (MCE).

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Please provide equations and state all values used to calculate the seismic factor.

Please use the redundancy factor from the UBC 1630.1.1 in the lateral analysis calculation and state that which you use.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Seismic Loading from a Maximum Credible Earthquake (MCE).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 27 - INCREASED EXPOSURE TO SEISMIC GROUND SHAKING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Increased Exposure to Seismic Ground Shaking.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

Since the County's official maps were prepared in 1975 seismologist have learned that "shaking is the most severe parallel to faults, not in a concentric pattern as had been previously thought, and that landslides cause more damage than earthquakes in Monterey County."

"[Consulting Geologist] Rosenberg also believes geologic information is not properly used by the County Planning Department, which relies on its own staff to review reports rather than on registered geologists. 'The popular belief is that this would be too expensive,' Rosenberg said.

'However, if only one house or road were saved from damage, then using a geologist would more than pay for itself.'
-Herald Oct 15 1999 Front Page "Mapping out the Big One"

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Increased Exposure to Seismic Ground Shaking.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
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46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 28 - INCREASED EXPOSURE TO SEISMIC-RELATED GROUND FAILURE.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Increased Exposure to Seismic-Related Ground Failure.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Increased Exposure to Seismic-Related Ground Failure.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
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16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
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27. Please state whether the MARGIN of ERROR is measured or assumed.
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*** 29 - NEW SEISMIC IMPACTS FROM SAN GREGORIO FAULT.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
New Seismic Impacts from San Gregorio Fault.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The San Gregorio Fault is capable of an earthquake magnitude of 7.3.
It is very definitely the major fault west of the San Andreas in Central Coastal California. (USGS Researchers April 1999)

"The official seismic maps in Monterey County were drawn up in 1975.

Consulting geologist Lew Rosenberg, who has produced more recent maps says some of the faults are incorrectly mapped on the 1975 version, and the San Gregorio Fault, isn't even shown. But the process of getting the new maps accepted by the county as the 'official' maps, he said, is complicated and time-consuming even though they have been reviewed and accepted by his peers."
-Herald Oct 15 1999 Front Page "Mapping out the Big One"

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
New Seismic Impacts from San Gregorio Fault.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 30 - HAZARDOUS MATERIALS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Hazardous Materials.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Hazardous Materials include gasoline, explosives and pure chemicals.

- Monterey County Hazardous Waste Management Plan, 1989

Poisonous, corrosive, flammable or toxic materials.
Asbestos and infectious waste need special handling.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Hazardous Materials.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 31 - HAZARDOUS WASTE INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Hazardous Waste Increase.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

In Monterey County in 1986, some 17,500 tons of hazardous waste were generated by major industries, small quantity generators (< 1 ton per source) and households (423 tons).

Monterey County's largest generators of haz waste were Texaco (10,300 tons), Soilserv (805 tons), PG&E-Moss-Landing (700 tons), Fort-Ord (278 tons), Mobil Oil (184 tons) and IDT (154 tons), Wilbur-Ellis (28 tons), Pacific Telephone and Telegraph (62 tons), Navy Postgraduate School (35 tons), Fort Hunter Liggett (27 tons), PG&E Alisal St. Service Center (33 tons), PG&E Griffin St. Service Center (39 tons), City of Monterey (31 tons), Sherwood Elementary School (29 tons), Soledad Prison (25 tons).
- Monterey County Hazardous Waste Management Plan, 1989

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Hazardous Waste Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 32 - EXPLOSIVE USE DURING CONSTRUCTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Explosive Use During Construction.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Please describe (brand name and chemical name) the types of explosives used during construction?

How many pounds of each type of explosive will be used during construction?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Explosive Use During Construction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 33 - EXPLOSIVES AFTER CONSTRUCTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Explosives after Construction.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Explosives after Construction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 34 - EXPLOSIVE TRANSPORTATION HAZARD.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Explosive Transportation Hazard.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Please detail what vehicles (trucks on specific roads, helicopters in
air) will transport each type of explosives.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Explosive Transportation Hazard.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 35 - EXPLOSIVE STORAGE HAZARD.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Explosive Storage Hazard.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Explosive Storage Hazard.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 36 - NOISE FROM EXPLOSIVE USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Noise from Explosive Use.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Noise from Explosive Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 37 - NON-NOISE HUMAN HARM FROM EXPLOSIVE USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Non-noise Human Harm from Explosive Use.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Humans can be harmed directly by the physical impact of an explosion's
shock wave or by debris from explosions.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Non-noise Human Harm from Explosive Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 38 - EXPLOSIVE USE - INDIRECT IMPACTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Explosive Use - Indirect impacts.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Explosive Use - Indirect impacts.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 39 - EXPLOSIVES - CONSTRUCTION IMPACTS ON SEA OTTERS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Explosives - Construction Impacts on Sea Otters.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Explosives - Construction Impacts on Sea Otters.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 40 - PROHIBIT EXPLOSIVES USE.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Prohibit Explosives Use.

* 41 - SPECIAL EVENTS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Special Events.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Special Events can cause many potentially significant environmental impacts including deaths, traffic congestion, loss of bus routes, parking loss, parking in residential neighborhoods, spectators trampling landscaping and native vegetation, littering, solid waste disposal, sewage disposal and its attendant smell, noise, and bomb threats.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Special Events.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 42 - SPECIAL EVENT TRAFFIC.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Special Event Traffic.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"There's a special event here just about every single weekend."
According to Brian Borgia owner of Monterey Peninsula Reservations in a July 3 1999 Herald article. Borgia also said the Concours in August and

the Indy Cars in September are the area's biggest hotel sellers.

The Pope's 1987 visit to the Monterey Peninsula had an EIR.

Desc	Dates	Tickets/Attendees	Roads
US Open Golf - PB Hwy 1 & 68	Summer?	227,000 T	>400,000
ATT Golf Tournament Hwy 1 & 68	Jan/Feb	150,000 Sp	
Salinas Airshow	Fall	80-90,000	Salinas
Laguna Seca CART	Sep	113,000	Hwy 68,218,1
Laguna Seca	Oct		Hwy 68,218,1
Laguna Seca	3 more/year		Hwy
Concours de Elegance	Aug 25,99, 3 days	15,000 (99)	
Hwy 1 & 68			
Concours Italiano	August/Fri 9-4:30	13,000 (99)	CV Road to Hwy 68;
CV road to Hwy 1			
Monterey Jazz Festival	Sep/Oct		Hwy 68
Historic Car races	Aug 25-99, 3 days		
US Amateur Golf	August	10,000 T (99)	Hwy 1 & 68, PB
Big Sur Marathon		3,000? Partic.	Hwy 1 to Big Sur
Good Old Days	March	~5,000	Hwy 1, Hwy 68
Bach Festival	July	~5,000	Hwy 1
PG Triathlon	Sep	~3500 (1600 Entrys+ 700 volntrs in 00	
Entire PG Shoreline			
Nabisco Golf Tournament			
Spalding Golf Tournament			
Pebble Beach Invitational Golf Tournament			
State Amateur Golf Tournament			

Out-of-Town participants, attendees and volunteers use significant amounts of water and cause significant traffic congestion which creates substantial air pollution.

SCRAMP boasts of "attracting more than 275,000 tourists to the area each year." Herald ad Nov 14 1999

"Expensive" events cause an increase in corporate jets (e.g. estimated 100 jets for the 2000 US Open).
"Expensive" events cause an increase in light trespass - light towers.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Special Event Traffic.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 43 - SPECIAL EVENT BUS ACCESS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Special Event Bus Access.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Older residents who depend upon buses may not be able to walk the extra distance necessary to get to the relocated bus stops without causing health problems. That assumes they can find the relocated bus stops.

"Residents were also affected in that due to the restricted parking and street closure, access to downtown became difficult. This was particularly true for those dependant on MST bus ridership. As a result of the closure of Lighthouse Avenue, bus routes were rerouted causing some to miss connections to the final destinations or forcing long walks." Pacific Grove Beacon, Sept 29, 2000

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Special Event Bus Access.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 44 - SPECIAL EVENT PARKING.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Special Event Parking.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Special events can attract thousands of people and thousands of cars
Those thousands of cars displace parking normally used by residents.
If an area is already at or beyond its parking capacity, evidenced by
residential parking permits, parking meters or timed parking - any
additional parking demand is a significant environmental impact.

Further special event parking can spill over onto sensitive habitat.
Vehicles can do long-term damage to soils preventing sensitive plant
species from regenerating.

At the 2002 ATT pro-am golf tournament volunteers were directing
spectators to park on places with signs explicitly warning to stay

off of the sensitive habitat.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Special Event Parking.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

*** 45 - SPECIAL EVENT WASTE.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Special Event Waste.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"There's not a whole lot of recycling occurring at those type of events
[special events such as the racing events at Laguna Seca Racetrack]."
-Jon Jennings, Monterey County Solid Waste Coordinator,
Herald, May 1,
2001 p A10

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Special Event Waste.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

*** 46 - SPECIAL EVENT SEWAGE.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Special Event Sewage.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Special Events require sewage disposal. The smell from the porta-potties during the event and afterwards during pumpout can be overwhelming and can be smelled for many city blocks.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Special Event Sewage.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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47. Please provide an ALTERNATIVE which avoids this impact.

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* 47 - SPECIAL EVENT GENERAL USE PERMIT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Special Event General Use Permit.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

If the number of events is not limited or the number of attendees is not limited there can be thousands of people and thousands of cars showing up as often as daily. Those thousands of car trips cause enormous air pollution, parking problems and noise.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Special Event General Use Permit.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
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16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
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19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 48 - SPECIAL EVENTS BOMB THREATS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Special Events Bomb Threats.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- Del Rey Oaks Police Chief Ron Langford is concerned about the threat of bombings because the Peninsula hosts "International Events". He said
"The consensus of Monterey County Police Chiefs is that we have to do something." There were nine bomb calls in 1999 as of July. In 1998 there
- were four, in 1997 there was only one. Such threats have caused the evacuation of several schools and neighborhoods, the Coast Guard pier, Fisherman's Wharf, the Marina Landfill, Lighthouse cinema, Monte Mart grocery store, the County Housing authority and CTB/McGraw Hill.
Some have exploded behind buildings at elementary schools, at high schools and in a minivan in a Salinas neighborhood. "It can take up to six hours for a bomb squad to respond to a call in Monterey County."
-Monterey Herald, July 25 1999, pg B1,2
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Special Events Bomb Threats.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 49 - SPECTATOR IMPACTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Spectator Impacts.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Spectators can trample vegetation and compact soils, increasing runoff and erosion.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Spectator Impacts.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 50 - NEW GOLF TOURNAMENTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
New Golf Tournaments.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Golf Tournament attendees include a lot more than just paid spectators.
Organizing Staff, Tournament players, Media, officials, volunteers and each of their guests. Each Player gets about 10 guest passes.

ATT Tournament Officials boast of selling more than 30,000 tickets per year.

Callaway Invitational @ Pebble Beach, Spyglass & Del Monte: Nov 18-21 1999

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
New Golf Tournaments.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 51 - ENERGY CONSERVATION AND MORATORIUM ON NEW HOOKUPS.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Energy Conservation AND Moratorium on New Hookups.

Energy Conservation measures when accompanied with a new connection moratorium can reduce the amount of energy needed so a (Dam, or Nuclear Power Plant) is unneeded for electricity production.

Paradoxically Energy Conservation can actually increase Energy use.

1) Developers get all the Energy you save - and then some.

When electricity consumption is reduced through conservation, builders assert "Look at all that unused electricity. Give it to us for more development." Then the PUC, local land use authorities give it to the developers. This permanently increases the number of Energy connections and reinstates maximum electricity use.

Both of these activities increase the number of Energy connections and when the immediate threat of drought lessens - Energy use resumes at a higher level.

2) People who Conserve get less Energy during Rationing than those who don't.

The amount of Energy residential users are allowed during Rationing is

based on how much they normally use. Responsible consumers conserve and use less than a Energy waster. Yet those who waste Energy only have to cut back by the same percentage as those who have been conserving. So Energy wasters benefit by getting a higher use limit during rationing than those who conserve.

3) First, Residential Energy Bills go up.

The Electricity companies (i.e. PG&E) complain to the regulating agencies that they aren't selling as much Electricity as they used to - so they need to raise their rates. The PUC gives them a rate increase.

This shows how conservation can have its own harmful electrical service impacts. To alleviate this problem - a moratorium on new hookups must accompany a conservation effort.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

* 52 - INCREASED ELECTRICAL ENERGY DEMAND VS CAPACITY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of

Increased Electrical Energy Demand vs Capacity.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

ELECTRIC EMERGENCY LARGEST IN 55 YEARS

As difficult as it may be to accept - all of us living in Monterey County, indeed all of us living in California, are laboring under an Electric Supply Emergency with no end in sight. The state government mandated local power blackouts we experienced the week of Jan 15, 2001 and which were front page news stories are additional proof of its reality.

"[California] Governor Gray Davis signed an emergency order late Wednesday authorizing the state to buy power to fend off further blackouts." Associated Press, Thurs. Jan 18, 2001

January 18, 2001 California Independent [Electrical] System Operators "declare an Electrical Emergency because of high demand and limited supplies." They begin two hour rolling blackouts.

State regulators imposed afternoon outages in northern California and came close to ordering the first statewide blackouts since World War II.

California uses 30 gigawatts of electricity at peak winter 2001 demand. California uses as much as 50 gigawatts during the summer when air conditioners are turned on. It was during the lower 30 gigawatt period that Northern California experienced intentional blackouts.

Since the electric supply is at and beyond capacity any further increase in demand is a potentially significant environmental impact.

We Were Warned
August 18 1998 California's Energy Commission analysis warns that the state could experience rolling blackouts as soon as Summer 1999 because of rising demand for electricity.

"Power Outages Feared"

July 14 1999 California Independent System Operator (Cal-ISO), which manages transmission for about 75 percent of California, reported that customers used a record breaking 45,884 megawatts of electricity. They issued a stage one emergency warning, which is when electricity operating reserves drops below 7 percent. A stage two is when the level drops below 5 percent. Below 5 percent reserve involuntary cuts to power would be likely according to Cal-ISO spokesman Patrick Dorinson.

Even though California's total electric demands have dropped, however slightly, from 1997 through 2000, the loss of energy capacity is caused by California Power companies selling more electricity out of state.

-Fred Keeley Assembly Speaker pro tem. Oct 2000

Electric Official's Bogus Promise

"The Con Ed system is in the best shape in fifteen years, and there's no problem about the summer." - Charles Luce (Board Chairman of Con Ed)
New York Television interview July 10, 1977

Impact - Traffic Deaths

One man was killed December 2000 in an automobile accident on Carmel Valley road near Highway 1 because the stop lights and street lights failed at 8:30 in evening.

Impact - Hospital Power Cut

Four San Francisco Hospitals had electricity cut Mar 19, 2001 even though they were supposed to be exempt from blackouts.

Impact - Widespread Looting

On July 13, 1977, three days after Luce's statement, a failure of the Con Ed system plunged the entire New York metropolitan area into a 24 hour blackout, which led to widespread looting.

Impact - Human Heating and Cooling

Lack of electricity to run home heaters and home air conditioners has killed many Americans.

INCREASE FROM FULL USE MEANS SIGNIFICANT ENVIRONMENTAL IMPACT

When a resource is fully used, or at capacity, any increase in demand is a potentially significant environmental impact under California's Environmental Quality Act (CEQA). It is also a potentially significant cumulative environmental impact.

An example of this is - Cal-Trans standard for a significant impact when an existing intersection is at LOS "F" [gridlock] is the addition of a single vehicle trip. "It is the Department's position that the addition of even one peak hour trip in a LOS environment represents a significant impact." (Cal-Trans letter dated Nov 18, 1997 to the Monterey County Planning Dept on the now approved September Ranch project.)

UNMITIGATABLE IMPACT

A demand increase is not merely a significant environmental impact - it is a significant environmental impact which is absolutely, wholly legally unmitigatable by cities and counties. That's because cities and counties have no legal authority to reduce electric demand by any energy consumer inside or outside their jurisdiction.

OVERRIDING CIRCUMSTANCES UNAVAILABLE

We find that you cannot legally make a finding of overriding circumstances except for new electric supply power facilities because of the significant increase in risk to public health and safety. We find there is no legal way around this significant and cumulative, unmitigatable environmental impact when basic safety and health concerns prohibit the use of overriding circumstances.

Please -

1. Graph the electric and gas capacity needed for the finished project starting with construction continuing through ten years of

operation.

2. Graph the electric supply and gas capacity available and permitted for the finished project.

3. Quantify the project's energy requirements and energy use efficiencies.

4. Quantify the project's effect on local and regional energy supplies.

5. Quantify the project's effect on peak and base period demands.

6. state the degree to which the project complies with existing energy standards.

7. state the project's depleting effects on energy resources.

8. Quantify the project's projected transportation energy use and its overall use of efficient transportation alternatives.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Increased Electrical Energy Demand vs Capacity.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 53 - OVERLOADED ELECTRIC INFRASTRUCTURE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Overloaded Electric Infrastructure.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

An overloaded Electric Infrastructure occurs when the power lines cannot supply sufficient electricity without transmission failure.

"The second power outage in two days affected about 10,000 homes on the Monterey Peninsula Sunday." PG&E spokeswoman Maureen Bogues "said the outage was caused by an underground cable that may have overloaded because of Sunday's heat wave." On Saturday night, a power outage affected about 7,600 homes in Monterey and Pacific Grove. Herald May 22, 2000, p B3 "Record day for heat in Monterey" Ibid, p B1

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of

Overloaded Electric Infrastructure.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 54 - ENERGY ELECTRICAL DEMAND AND CAPACITY DURING CONSTRUCTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Energy Electrical Demand and Capacity During Construction.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Please graph the electric and gas capacity needed through the construction phase of the project.

Please graph the electric and gas capacity available and permitted through the construction phase of the project.

1. Please state the project's construction phase energy requirements and energy use efficiencies;

2. the project construction phase's effect on local and regional energy supplies;

3. the project's construction phase effect on peak and base period demands;

4. the degree to which the project's construction phase complies with existing energy standards;

5. the project's construction phase effects on energy resources;

6. the project's projected construction phase transportation energy use and its overall use of efficient transportation alternatives.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Energy Electrical Demand and Capacity During Construction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 55 - ELECTRICITY INTERRUPTIONS TO OTHER CUSTOMERS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Electricity Interruptions to other Customers.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Electricity Interruptions to other Customers.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 56 - INCREASED GAS ENERGY DEMAND AND CAPACITY.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Increased Gas Energy Demand and Capacity.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Increased Gas Energy Demand and Capacity.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 57 - SUBURBAN HEAT INCREASE.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Suburban Heat Increase.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Cities are warmer than natural lands because the thermal properties

of concrete, asphalt and glass are very different from vegetation, soil and waterbodies.

The heat of Mexico City "can exceed that in neighboring countryside by 8 to 10 degrees C." Nature, 6 Apr 2000, p 555

Warmer living areas (homes and businesses) use more energy for air conditioning.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Suburban Heat Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 58 - ADDITIONAL POWER LINES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Additional Power Lines.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Additional Power lines -
Risk human life in climbing power poles.
Risk human life when lines sag from high power delivery.

Risk fire from trees falling on live poles.
Tree sites exposed to Wind can have increased tree falls.
Risk from Power poles falling and exposing people and vegetation to dangerously high voltage.

Require constant tree and vegetation trimming. PG&E has 800 crews (not merely 800 staff) pruning 2 million trees per year. PG&E's Greg Holquist at California Pitch Canker Task Force meeting, 3/15/00)

Induce off road vehicle traffic under power poles.
Require insulator maintenance to prevent arc flashes.
In Monterey pine forest, tree removal and pine chipping increases bark beetle attacks on Monterey pine.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Additional Power Lines.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,

credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the

baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 59 - UNDERGROUNDING OF POWER TRANSMISSION AND DISTRIBUTION LINES.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Undergrounding of Power Transmission and Distribution lines.

"In California, trees interfering with power lines are the second largest cause of power outages." University of California Cooperative Extension, Division of Agriculture and Natural Resources, Leaflet 21470

"Each year, hundreds of people throughout the United States are injured or killed when they climb or prune trees near power lines."

Undergrounding Power Transmission and Distribution lines -
- Does not risk fire from trees falling on live poles.
- Does not risk human life in climbing power poles.
- Does not risk human life when lines Sag.
- Does not risk from power poles falling and exposing people and vegetation to dangerously high voltage.
- Does not require constant tree and vegetation trimming.
- Does not induce off road vehicle traffic under power poles.
- Does not require insulator maintenance to prevent arc flashes.
- Already has a buried gas line along existing power lines.
- Do not experience power outages due to wind or trees.
- Do not experience power outages due to ice or snow.

* 60 - ELECTROMAGNETIC FIELDS (EMF).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Electromagnetic fields (EMF).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

EMFs increase Cancer
High levels of electromagnetic fields (EMF) can promote growth of cancers in laboratory animals (Science News 1/10/98, p 29) and some evidence links them to cancers in people (Science News 6/30/90, p 404).

EMFs and increased Heart Attack correlation
"Men in trades exposed to high EMFs - such as linemen and power plant operators - were far more likely to have died from heart attacks and heart conditions related to abnormal rhythms, or arrhythmias." Another study detected an increase in heart disease. (Science News 1/30/99).

Utility Transmission lines create up to 300 milligauss under the line.
Utility Distribution lines create up to 80 milligauss under the line.

A hair dryer can create 20,000 milligauss @ 1.2", or 70 mg @ 1 foot.
A microwave oven can create 2,000 milligauss @ 1.2", or 80 mg @ 1 foot.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Electromagnetic fields (EMF).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that

number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 61 - REMOVAL OF REDUNDANT POWER LINES.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Removal of Redundant Power lines.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

* 62 - PLANTING TREES FOR ENERGY CONSERVATION.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Planting Trees for Energy Conservation.

Trees play an important role in energy conservation by the modification of temperature extremes (cooling shade and nighttime warming insulation), humidity, and winds. This role is particularly important in reducing the amount of energy consumed in heating and cooling buildings and homes, and potentially in producing a local fuel and energy source.

-

* 63 - PLANTING TREES FOR NIGHTTIME WARMING INSULATION.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Planting Trees for Nighttime Warming Insulation.

-

* 64 - LIGHTING ENERGY WASTE.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Lighting Energy Waste.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

"We waste an astronomical amount of energy and money by all this bad lighting, shining it where it is not needed or wanted (including up into the sky) and by using energy inefficient light sources and lighting designs." (cite)

About 43 percent of energy use in the U.S. is unnecessarily wasted. Living in The Environment by G. Tyler Miller pg 439, Wadsworth Publishing 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance of Lighting Energy Waste.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 65 - POLLUTED WATER ENERGY WASTE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Polluted Water Energy Waste.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

When water is polluted it must often be boiled before drinking. This wastes energy.

About 43 percent of energy use in the U.S. is unnecessarily wasted.
Living in The Environment by G. Tyler Miller pg 439,
Wadsworth
Publishing 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Polluted Water Energy Waste.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 66 - ENERGY EFFICIENT LIGHT SOURCES.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Energy Efficient Light Sources.

Use energy efficient light sources. Light sources vary greatly in their efficiency. Consider especially the use of low pressure sodium lamps; they are the most efficient of all, and they are also strongly preferred by astronomers as the light output by LPS is essentially all one color and can be filtered out quite well. LPS is excellent for street lighting, parking lots, security lighting, and other applications where

color rendering is not critical. Careful lighting design can be done using LPS for essentially any application.

"It All Works. Such quality lighting design has been used for some time now in many locations. Such cities are benefiting by better lighting for their citizens, by a great deal of energy savings, and by darker skies (but not darker streets). We all really do win." For more info "<http://www.darksky.org/ida/key/intro.html>"

* 67 - LESSENNED POLICE AVAILABILITY.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Lessened Police Availability.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Lessened Police Availability.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 68 - FIRE RISK.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Fire Risk.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Monterey
Cannery Row is in a high fire risk zone according to the Monterey Fire Dept. The 12/98 DEIR for the Cannery Row Marketplace states " In the past 40 years, there have been approximately 30 fires on Cannery Row, 18 of which were considered to be major blazes."

Pebble Beach Forest

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Fire Risk.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows

whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 69 - LESSENE FIRE DEPARTMENT AVAILABILITY.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Lessened Fire Department Availability.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Annexations of County land to a city causes a drop in revenue to the Rural Fire Districts. Losses in revenue cause a decrease in ability to maintain fire protection services.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Lessened Fire Department Availability.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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47. Please provide an ALTERNATIVE which avoids this impact.

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* 70 - WATER PRESSURE TO FIRE HYDRANTS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Water Pressure to Fire Hydrants.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

A standard fire flow pressure is 60 psi peak pressure with no pressures less than 40 psi. Pressures exceeding 110 psi are also unacceptable.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Water Pressure to Fire Hydrants.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,

credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 71 - WATER FLOW TO FIRE HYDRANTS.

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Please carefully analyze and disclose the potential impacts of
Water Flow to Fire Hydrants.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The absolute minimum flow to adequately fight fires in residential structures is 1400 gallons per minute.
Cypress Knolls Retirement Project, Marina, Ca, Draft EIR Dec 1999

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Water Flow to Fire Hydrants.

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* 72 - INCREASED DELAY FOR EMERGENCY VEHICLES.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Increased Delay for Emergency Vehicles.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Increased Delay for Emergency Vehicles.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 73 - INCREASED DELAY ON EMERGENCY ROUTES TO HOSPITALS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Increased Delay on Emergency Routes to Hospitals.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Big Sur only has 2 2-lane automobile exit routes.

Carmel Valley only has 2 2-lane automobile exit routes.

Carmel has only 4 2-lane automobile exit routes.

Pacific Grove and New Monterey only have 6 automobile exit routes (7 outbound lanes). Three (3) of those are through the Presidio of Monterey. The Presidio is often closed for national security reasons leaving only three exit bottlenecks for a population of some 25 thousand people.

During an earthquake, a fire or an air pollution disaster the existing restricted exits could turn into gridlock escalating an emergency situation into a disaster.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Increased Delay on Emergency Routes to Hospitals.

1b. If no objective criteria are used please state that clearly.

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* 74 - REDUCED LIBRARY AVAILABILITY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Reduced Library Availability.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

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(non-subjective) CRITERIA used to determine the impact significance of
Reduced Library Availability.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 75 - SCHOOL CAPACITY.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of School Capacity.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Do all potentially impacted schools have classroom capacity remaining?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of School Capacity.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 76 - CONSTRUCTION NOISE INTERFERENCE WITH SCHOOL ACTIVITIES.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of Construction Noise interference with School Activities.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Noise interference with School Activities.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 77 - INTERFERENCE WITH SCHOOL ACCESS BY ROADWAYS OR CONSTRUCTION.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Interference with School Access by roadways or construction.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Road construction can impede access to public facilities and create pedestrian safety hazards.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Interference with School Access by roadways or construction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 78 - PARKS AND RECREATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Parks and Recreation.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Parks and Recreation.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 79 - RECREATIONAL POLLUTION.

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of
Recreational Pollution.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Too many people using recreation areas can cause erosion, noise
sewage problems and water demand.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Recreational Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 80 - INTERFERENCE WITH PARK OR RECREATION ACCESS BY ROADWAYS OR CONSTRUCTION.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Interference with Park or Recreation Access by roadways or construction.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Road construction can impede access to public facilities and create
pedestrian safety hazards.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Interference with Park or Recreation Access by roadways or construction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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10. Please state whether this MARGIN of ERROR is measured or assumed.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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*** 81 - TEMPORARY DISRUPTION OF UTILITY SERVICES.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Temporary Disruption of Utility Services.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Temporary Disruption of Utility Services.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 82 - INCREASED RISK TO NEIGHBORHOOD CHILDREN FROM CONSTRUCTION VEHICLE TRAFFIC.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Increased risk to neighborhood children from Construction vehicle traffic.
- If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Increased risk to neighborhood children from Construction vehicle traffic.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.
 12. Please state the most extreme values which could be encountered.
 13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
 14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
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 25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
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 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergetic impacts.
 33. Please list, describe and quantify all Construction impacts related to this one.
 34. Please list, describe and quantify all Growth impacts related to this one.
 35. Please list, describe and quantify all Indirect impacts related to this one.
 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
 37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
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 39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
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 41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
 42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
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 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 83 - INCREASED RISK TO NEIGHBORHOOD CHILDREN FROM HEAVY VEHICLE TRAFFIC.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Increased risk to neighborhood children from Heavy vehicle traffic.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Increased risk to neighborhood children from Heavy vehicle traffic.
 - 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
 - 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
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 12. Please state the most extreme values which could be encountered.
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 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
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 - 20b. If no margin of error is used please state that clearly.
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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 84 - REDUCED VEHICLE SAFETY FROM CONSTRUCTION VEHICLES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Reduced Vehicle Safety from Construction vehicles.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Reduced Vehicle Safety from Construction vehicles.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 85 - INCREASED FIRE HAZARD & RISK FROM HAZARDOUS MATERIALS.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Increased Fire Hazard & Risk from Hazardous Materials.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Monterey Herald Headlines "Roofing Tar Trailer Explodes,"
"Residents Flee Salinas Vehicle Fire" Aug 5 1999
The article goes on to state "A Salinas neighborhood was evacuated
as flames engulfed a roofing truck..."
"...responding firefighters quickly upgraded it to a two-alarm fire
when they learned that it was a roofing truck laden with hot tar with a
propane tank on board."
"Firefighters were pumping three thousand (3000) gallons a minute of
water on the blaze to put it out and shield adjacent houses from the
high radiant heat of the flames." The truck was owned by
Williams Roofing
of Castroville.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact
significance of

Increased Fire Hazard & Risk from Hazardous Materials.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 86 - HAZARDOUS DESIGN FEATURES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Hazardous Design Features.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Sharp curves in roads and dangerous intersections can decrease vehicular safety.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Hazardous Design Features.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 87 - ROAD DAMAGE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Road Damage.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

According to American Assn. of State Transportation Officials (AASTO)
[made up of the Dept. of Transportation heads in each state]-
-one truck loaded to the US legal limit of 80,000 lbs. has the impact on a point of highway as 9,600 cars.
Many states allow trucks much bigger than 80,000 lbs.
-AAA magazine Jan 2000

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of

Road Damage.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 88 - VEHICLE VISION OBSCURED BY TRUCKS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Vehicle Vision Obscured by Trucks.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

During wet conditions Trucks spray considerably more water into the air which can and does obscure vision through windshields of passenger vehicles.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Vehicle Vision Obscured by Trucks.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 89 - INTERFERENCE WITH EMERGENCY ACCESS BY ROADWAYS OR CONSTRUCTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Interference with Emergency Access by roadways or construction.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Road construction can impede access by Emergency vehicles and impede exit of citizens leaving an emergency area.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Interference with Emergency Access by roadways or construction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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20b. If no margin of error is used please state that clearly.

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whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 90 - ARCHEOLOGICAL RESOURCES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Archeological Resources.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Sonoma State prepares Sensitivity Maps for areas in California.

What is the highest level of sensitivity for areas this project could affect? (There is no area with zero sensitivity)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Archeological Resources.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 91 - PALEONTOLOGICAL RESOURCES.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of Paleontological Resources.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Paleontological Resources.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 92 - HISTORICAL RESOURCES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Historical Resources.

If you claim the document contains proof of no-significant-
impact for
this impact please explicitly state the page number and
paragraph.

Has anything newsworthy occurred on the site that put it on
the front page
of a local or larger newspaper?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the
objective
(non-subjective) CRITERIA used to determine the impact
significance of
Historical Resources.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe
how the threshold of significance chosen is scientifically
testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS
(numbers) used to determine the significance for EACH
criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to
determine the significance for each criteria.

5b. If no method of measurement was used please state that
clearly for each criteria and explain thoroughly how the data
was obtained.

6. Please quantify the existing or current BASELINE
measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level
and whether the MARGIN of ERROR is measured or
assumed.

8. Please state the VARIANCE or fluctuation, assumed or
expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or
confidence level.

10. Please state whether this MARGIN of ERROR is
measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be
encountered.

13. Please describe and quantify which criteria and
ASSUMPTIONS the Impact Significance predictions are
most SENSITIVE.

14. Please analyze and quantify how sensitive those
predictions are to reasonably foreseeable varying criteria and
assumptions.

15. Please provide a graph of HISTORICAL measurements.

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17. Please quantify how this impact would vary over that time
period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the
impact changes from significant to less-than-significant and
the clear criteria and rationale for that
number.

19. Please provide the MARGIN of ERROR used (in percent
and absolute amount) for measuring the Significance
THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is
measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the
impact changes from LEGAL to ILLEGAL for ALL related and
potentially relevant local, state and federal
laws.

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with increasing input, other impacts have complex non-linear
relationships. Please provide a graph that shows
whether the relationship is linear or otherwise - when at and
near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM
CHANGE, to which the IMPACT could raise or lower the
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change is an AVERAGE amount, a worst case expected or a
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related to this one.

31. Please quantify all potential CUMULATIVE impacts
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and synergetic impacts.

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still be restored.

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PERCENTAGE of existing) of this resource that can be
LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed
this impact.

44. Please cite each expert's training, and peer reviewed,
validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this
impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this
impact.

48. Please list all other studies initiated by the applicant
related to this impact, including subject matter breadth,
author's names and dates and where they
can be examined.

* 93 - NATIONAL REGISTER PROPERTIES.

The Document appears to have ignored this potentially
significant Impact.
Please carefully analyze and disclose the potential impacts
of
National Register properties.

If you claim the document contains proof of no-significant-
impact for
this impact please explicitly state the page number and
paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the
objective
(non-subjective) CRITERIA used to determine the impact
significance of
National Register properties.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe
how the threshold of significance chosen is scientifically
testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS
(numbers) used to determine the significance for EACH
criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to
determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 94 - BULLDOZING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Bulldozing.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Bulldozing causes noise, can leave geological scars, can dramatically increase soil erosion, and release asbestos when serpentine rock is affected (Sci Am Feb 2000, p 34), can induce invasive plants.

"Bulldozing away a forest can increase soil erosion by 10 to 1,000 fold.

The mud washed from a typical construction site can damage three miles of downstream waters with recovery taking up to a century." The Cumulative Effects of Land Development on Streams, Rivers, Lakes, Tidal Waters & Wetlands, by Richard Klein 1979

Bulldozing for fire breaks and access can leave geological scars which never heal and cause increased erosion.

Heavy Construction Vehicles including Bulldozers and Graders make unrestricted, unregulated noise.

Bulldozing, including new road cuts and clearing old roads, leaves an excellent opportunity for introduction and enhancement of Pampas type grasses and Scotch and French Broom.

"In the Coastal fog belt of California, from Monterey County northward, Pampas type grasses and Scotch and French Broom are invading DISTURBED soils, grasslands, open woodlands and roadsides. They crowd out native plants and wildflowers, changing the appearance of the natural landscape, decreasing the food and habitats of wildlife and creating what many consider an eyesore." (Invasive Exotic Plants in Monterey County, brochure by Monterey County Planning Dept #293-0274 4/98)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Bulldozing.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 95 - ODOR FROM CONSTRUCTION VEHICLES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Odor from Construction Vehicles.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Odor from Construction Vehicles.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
- 30 Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
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- * 96 - MAXIMUM NUMBER OF ACRES OF CONSTRUCTION PER DAY.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Maximum number of Acres of Construction per day.
- If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.
- According to the MBUAPCD, approximately 40 pounds of PM10 are emitted
per acre per day of construction activity.
- Please summarize the total number of days of construction.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Maximum number of Acres of Construction per day.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 97 - GOLF COURSE CONSTRUCTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Golf Course Construction.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Hydrogen Peroxide is commonly used to prepare soil for a golf course.

Please describe whether Hydrogen Peroxide will be used to prepare the ground, if so how much will be used. If is not to be used, how its use will be prohibited and enforced.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Golf Course Construction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 98 - CONSTRUCTION ACCIDENTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Construction Accidents.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Construction workers accidentally punctured a major sewer main, sending millions of gallons of raw sewage into Biscayne Bay at Miami Beach closing miles of beaches. AP June 21, 00

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Accidents.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 99 - CONSTRUCTION CAUSED EROSION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Construction Caused Erosion.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Erosion caused directly by Construction would include heavy vehicles driving on unpaved dirt causing road ruts and off road ruts, runoff construction water AND dust mitigation water deepening those ruts.

Soil Erosion at a Construction site is 2000 times the rate of a natural forest. (Based upon the cover factor of the universal soil loss equation cited in Richard D. Klein's "Protecting the Aquatic Environment from the Effects of Golf Courses" Oct 1993)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Caused Erosion.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 100 - CONSTRUCTION INDUCED EROSION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Construction Induced Erosion.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Erosion induced by Construction would include rain deepening road ruts.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Induced Erosion.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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35. Please list, describe and quantify all Indirect impacts related to this one.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 101 - CONSTRUCTION PHASE STREAM SILTATION AND POLLUTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Construction Phase Stream Siltation and Pollution.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Monterey County Grading Ordinance Section 16.08.300 (C)(2) states:

"No vegetation removal or grading will be allowed which will result in siltation of water-courses or uncontrollable erosion. (Ord 2534 Section 114, 1979)"

This law does not say that some siltation may be allowed - it says NO SILTATION may result from vegetation removal or grading. Please explain how you will absolutely prevent any Stream Siltation so this law is not violated.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Phase Stream Siltation and Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
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27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 102 - CONSTRUCTION PHASE SEDIMENT GENERATION.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Construction Phase Sediment Generation.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- "Land disturbance during residential construction or construction of new
golf course facilities exposes bare soil to water and wind erosion,
surface crusting and loss of physical soil structure (Richards and
Middelton 1978). These conditions may result in significant
surface loss
of water, sediment and nutrients." Golf Course Management &
Construction, USGA 1992
- "Wolman and Schick (1967) determined that annual
sediment yield from
construction sites varies from 38 to 251 Mg ha-1 (17 to 112
tons ac-1)
of sediment annually." Water Resources Research 3:451-
464, Effects of
construction on fluvial sediment in urban and suburban areas
of
Maryland, Wolman M.G. and Schick, A.P. cited by Golf
Course Management &
Construction, USGA 1992.
- "Daniel et al. (1979) observed that annual sediment losses
from
residential construction sites ranged from 13.4 to 26.9 Mg
ha-1 (6 to 12
tons ac-1). On average, sediment yield from the construction
site was 20
times higher compared to adjacent agricultural watersheds." Daniel,
McGuire, Stoffel and Miller, Sediment and nutrient yield from
residential construction sites, Journal of Environmental
Quality
8(3):304-308 cited by Golf Course Management &
Construction, USGA 1992
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact
significance of
Construction Phase Sediment Generation.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe
how the threshold of significance chosen is scientifically
testable, repeatable, falsifiable,
credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS
(numbers) used to determine the significance for EACH
criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to
determine the significance for each criteria.
- 5b. If no method of measurement was used please state that
clearly for each criteria and explain thoroughly how the data
was obtained.
6. Please quantify the existing or current BASELINE
measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level
and whether the MARGIN of ERROR is measured or
assumed.
8. Please state the VARIANCE or fluctuation, assumed or
expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or
confidence level.
10. Please state whether this MARGIN of ERROR is
measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be
encountered.
13. Please describe and quantify which criteria and
ASSUMPTIONS the Impact Significance predictions are
most SENSITIVE.
14. Please analyze and quantify how sensitive those
predictions are to reasonably foreseeable varying criteria and
assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time
period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the
impact changes from significant to less-than-significant and
the clear criteria and rationale for that

number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 103 - CONSTRUCTION DAMAGE TO WILDLIFE HABITAT.

If any listed fish habitat (even a quarter acre) is lost even temporarily, this is a significant impact under CEQA Guideline 15065. The Steelhead trout and California Red-Legged Frog could lose habitat by construction cause erosion causing siltation or direct vehicle damage to habitat.

* 104 - CONSTRUCTION ACTIVITIES INCREASING FIRE DANGER.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Construction Activities Increasing Fire Danger.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Monterey Herald Headlines "Roofing Tar Trailer Explodes" "Residents Flee Salinas Vehicle Fire" Aug 5 1999
The article goes on to state "A Salinas neighborhood was evacuated as flames engulfed a roofing truck..."
"...responding firefighters quickly upgraded it to a two-alarm fire when they learned that it was a roofing truck laden with hot tar with a propane tank on board."
"Firefighters were pumping three thousand (3000) gallons a minute of water on the blaze to put it out and shield adjacent houses from the high radiant heat of the flames." The truck was owned by Williams Roofing of Castroville.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance of Construction Activities Increasing Fire Danger.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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47. Please provide an ALTERNATIVE which avoids this impact.

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* 105 - MAINTENANCE ACTIVITIES INCREASING FIRE DANGER.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Maintenance Activities Increasing Fire Danger.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Monterey Herald Headlines "Roofing Tar Trailer Explodes" "Residents Flee Salinas Vehicle Fire" Aug 5 1999
The article goes on to state "A Salinas neighborhood was evacuated as flames engulfed a roofing truck..."
"...responding firefighters quickly upgraded it to a two-alarm fire when they learned that it was a roofing truck laden with hot tar with a propane tank on board."
"Firefighters were pumping three thousand (3000) gallons a minute of water on the blaze to put it out and shield adjacent houses from the high radiant heat of the flames." The truck was owned by Williams Roofing of Castroville.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Maintenance Activities Increasing Fire Danger.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 106 - WATER DISTRIBUTION INFRASTRUCTURE CONSTRUCTION.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Water Distribution infrastructure Construction.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Water Distribution infrastructure Construction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 107 - NEW SEWER SYSTEM CONSTRUCTION.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
New Sewer System Construction.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
New Sewer System Construction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 108 - SOLID WASTE FROM CONSTRUCTION OPERATIONS.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Solid Waste from Construction Operations.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Solid Waste from Construction Operations.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 109 - CONTAINER DISPOSAL.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Container Disposal.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Container Disposal.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 110 - CONSTRUCTION SITE AIR POLLUTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Construction Site Air Pollution.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Construction Site Air Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 111 - CONSTRUCTION CHEMICAL USE AND SPILLS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Construction Chemical Use and Spills.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Accidental spills of hazardous materials or careless fueling or oiling of vehicles or equipment could degrade water quality or upland habitat to a degree where the ESA listed California Red-Legged Frog (*Rana aurora draytonii*) are adversely affected or killed." US-FWS Biological Opinion on Arroyo Seco Bridge Replacement. April 27 1999

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Chemical Use and Spills.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 112 - CEMENT OR CONCRETE POURED OR MIXED IN OR NEAR STREAMS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Cement or Concrete Poured or Mixed In or Near Streams.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"The contamination of the stream by wet concrete could cause potential skin and respiratory system irritation in the California Red-Legged Frog (*Rana aurora draytonii*)."
US-FWS Biological Opinion on Arroyo Seco Bridge Replacement. April 27 1999

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Cement or Concrete Poured or Mixed In or Near Streams.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 113 - CONSTRUCTION MATERIALS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Construction Materials.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Creosote is used to preserve railroad ties. Railroad ties are often recycled as fences, retaining walls and bridge surfaces.

CREOSOTE is on California's Prop 65 List of Known Carcinogens. Creosote is a wood preservative on EPA's list of materials classified as restricted use in 1985. It is in the Group B1 Pesticides "Probable Human Carcinogens with Limited Human Evidence"

"Restricted Use" means:
"A pesticide that is available for purchase and use only by certified pesticide applicators or persons under their direct supervision. This designation is assigned to a pesticide product because of its relatively high degree of potential human and/or environmental hazard."

Source: www.epa.gov/pesticides/carlist/table.htm updated June 11, 1998
Creosote also has a powerfully repugnant smell that lasts years and on hot days can be detected dozens of meters from the source.

Please discuss all uses and especially distances from water, wetlands or other wild habitat and the potential impacts on threatened and endangered species.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Materials.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 114 - CONSTRUCTION PESTICIDE USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Construction Pesticide Use.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Pesticide Use.

- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
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9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
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12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
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- * 115 - CONSTRUCTION PESTICIDE SPILLS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Construction Pesticide Spills.
- If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Pesticide Spills.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
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- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

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* 116 - CONSTRUCTION PETROCHEMICAL USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Construction Petrochemical Use.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Petrochemical Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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20b. If no margin of error is used please state that clearly.

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* 117 - CONSTRUCTION PETROCHEMICAL SPILLS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Construction Petrochemical Spills.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Petrochemical Spills.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 118 - CONCRETE LEACHATE AND PARTICULATE LEAKS AND SPILLS.**

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of
Concrete Leachate and Particulate Leaks and Spills.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Concrete Leachate and Particulate Leaks and Spills.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 119 - OTHER POTENTIAL CONSTRUCTION POLLUTANTS.**

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of
Other potential Construction Pollutants.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Other potential Construction Pollutants.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal

laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 120 - TACKIFIER (E.G.LATEX ACRYLIC COPOLYMER) AFTER CUT & FILL OPERATIONS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Tackifier (e.g.latex acrylic copolymer) after cut & fill operations.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Tackifier (e.g.latex acrylic copolymer) after cut & fill operations.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 121 - ROAD DUST CONTROL AGENTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Road Dust Control Agents.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Road Dust Control Agents.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 122 - CONSTRUCTION CHEMICALS DISPOSAL.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Construction Chemicals Disposal.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Chemicals Disposal.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 123 - LEFTOVER TRASH.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Leftover Trash.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Trash left during or after project activities could attract predators such as raccoons to work sites which in turn could harass or prey on the listed [California Red-Legged Frog (*Rana aurora draytonii*)]."
US-FWS
Biological Opinion on Arroyo Seco Bridge Replacement. April 27 1999

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Leftover Trash.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 124 - GROWTH IMPACTS ON EACH LISTED SPECIES AND THEIR HABITATS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Growth Impacts on each Listed Species and their Habitats.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Growth Impacts on each Listed Species and their Habitats.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 125 - GROWTH IMPACTS ON RED-LEGGED FROG AND THEIR HABITATS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Growth Impacts on Red-Legged Frog and their Habitats.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Growth Impacts on Red-Legged Frog and their Habitats.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
 9. Please state the variance's MARGINS of ERROR or confidence level.
 10. Please state whether this MARGIN of ERROR is measured or assumed.
 11. If an average is used, please state which kind of average.
 12. Please state the most extreme values which could be encountered.
 13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
 14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
 23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 24. Please state whether the MARGIN of ERROR is measured or assumed.
 25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
 26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 27. Please state whether the MARGIN of ERROR is measured or assumed.
 28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
 29. Please list all potential CUMULATIVE impacts related to this one.
 30. Please describe all potential CUMULATIVE impacts related to this one.
 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergetic impacts.
 33. Please list, describe and quantify all Construction impacts related to this one.
 34. Please list, describe and quantify all Growth impacts related to this one.
 35. Please list, describe and quantify all Indirect impacts related to this one.
 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
 37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
 38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
 39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
 40. Please state whether the margin of error is measured or assumed.
 41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
 42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
 43. Please name each EXPERT who prepared and reviewed this impact.
 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
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- * 126 - GROWTH IMPACTS ON STEELHEAD AND THEIR HABITATS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Growth Impacts on Steelhead and their Habitats.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Growth Impacts on Steelhead and their Habitats.
 - 1b. If no objective criteria are used please state that clearly.
 2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
 - 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
 - 3b. Please quote the definition used.
 4. If no measurement units are used please state that clearly.
 - 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
 - 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
 6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
 7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
 8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
 9. Please state the variance's MARGINS of ERROR or confidence level.
 10. Please state whether this MARGIN of ERROR is measured or assumed.
 11. If an average is used, please state which kind of average.
 12. Please state the most extreme values which could be encountered.
 13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
 14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal

laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 127 - WILDLAND FIRE INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Wildland Fire Increase.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

When an area grows in human population the number of fires increases.

"For much of this century, wildland fire frequency has been driven by population density (Fig 4); more people on the landscape equals more fires." Historic Fire Regime in Southern California, Keeley, J. & Fotheringham C., Dec 2001, Conservation Biology.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Wildland Fire Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 128 - TOURISM.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Tourism.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Tourism's impacts include traffic congestion, parking loss, increased garbage, increased noise and loss of visual aesthetics.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Tourism.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal

laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 129 - TOURISM IN PARKS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Tourism in Parks.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"During the height of tourist season, certain regions within [the U.S.'s most popular] parks are overwhelmed with congested traffic, vandalism, of natural and cultural features, noise, air pollution, and litter. As ever more and more people flock to popular scenic attractions, they cause ever-widening circles of destroyed vegetation and compacted soil. Millions of feet are wearing down the hiking trails and making them more subject to erosion." Environmental Science, M,M & W, 1993

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Tourism in Parks.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.

- 30 Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 130 - HUMAN CAUSED NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Human Caused Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

All increases in human civilization cause large increases in noise.
Major noise sources include construction, cars, buses, trucks and aircraft.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Human Caused Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 131 - PRESENCE OF DOMESTIC PETS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Presence of Domestic Pets.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Kill, Take, Harassment of Threatened Species
This is a known significant impact on ESA listed birds which nest on the ground or coastal beaches as Snowy plovers do. Dogs killed several nesting Snowy plovers in 1999 on Monterey Peninsula beaches -Audubon Society, Monterey Peninsula Chapter

Domestic cats are well known to kill neighborhood birds and small mammals. When cats live adjacent to wilder areas - their impact creates an edge effect into the wilder area.

"Rats and feral cats have eliminated ground nesting birds in many areas, including Jamaica, Australia, New Zealand, and the Galapagos Islands."
Environmental Science; Morgan, Moran & Weirsmas; W.C. Brown Pub. 1993

Dogs typically chase (harass) wildlife, especially birds.

KILLING OF PROTECTED SPECIES BECAUSE OF DOMESTIC ANIMALS
When houses are built near a wild area, the presence of domestic cats and other outdoor animals can attract mountain lions. Even though mountain lions are fully protected in California, California's Department of Fish and Game always issues a kill (depredation) permit when a mountain lion kills a domestic pet.

False Mitigation
As mitigation to this Monterey County responded that all cats would be required to remain on a leash. The National Council of Teachers of English found the leash idea so ludicrous they featured it their July 1997 edition of the Quarterly Review of Doublespeak.

Horse's fecal matter attracts large numbers of flies.
"Fermenting, fresh, horse manure is the chief breeding place of the housefly. Houseflies are known to carry the disease organisms causing

typhoid fever, cholera, summer diarrhea, dysentery, tuberculosis, etc, just to name a few." Handbook of Pest Control", Arnold Mallis, 1945

Feral Animals

Often cats and dogs are abandoned as owners move away.

Forests near induced edges, for example, may have a higher density but lower diversity of birds than the interior forest. A number of studies have shown increased predation of songbird and quail eggs near forest edges. The predation is worst near developed areas (which might have unnaturally high populations of cats, raccoons, skunks, jays and crows)." - Mitch Lansky "Beyond the Beauty Strip"

Noise

A dog's bark is particularly annoying when the area is relatively quiet. "Very Large Dogs, Barking and Howling" can generate 85 decibels. National Institute Deafness, Acoustic consultants and airport consultants, cited by E. Knapp AIA, Architect - Analyst, Eagan MN, Specialist in Animal Facility Design & Planning.

Dogs Barking can make 80 dbA at 10 meters. from "Operational Conditions for Continuous Mining Systems in Hard Rock Open Pit Mines", 15-08-1996

Pesticides

American's spend more than 1 Billion dollars a year battling pet fleas and ticks with toxic chemicals. These poisons settle in homes and yards, eventually making their way into landfills which EPA admits cannot be sealed from leakage, rivers, streams and the water table. Their active ingredients include Diazinon, carbaryl, propoxur, and DDVP - all nerve poisons.

Cat Feces and Kitty Litter

"Clay Kitty litter, which is strip mined, contains silica dust - a carcinogen." Apparently no-toxic and flushable methods include wood-based pellets, zeolites and wheat grass pellets. Sierra Magazine Sept 1999 pg 27 (Adult cats can use 250 pounds of kitty litter waste per year per cat.)

"Cat feces contain toxic bacteria and should never be composted." Sierra Magazine Sept. 1999 pg 27

Pet Roundworms

"Roundworms from domestic dogs have caused serious illness for many more people than raccoon roundworms." Donald Burton, Veterinarian and Executive Director of the Ohio Wildlife Center in Columbus Ohio.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Presence of Domestic Pets.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 132 - EXISTENCE OF POWER LINES.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Existence of Power Lines.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

A non-trivial percentage of many listed bird species (Condors, eagles, Peregrine falcons) have been killed by their contact with power lines.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Existence of Power Lines.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 133 - INCREASED SHOOTING OF ANIMALS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Increased Shooting of Animals.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Increased Shooting of Animals.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.	26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	Please carefully analyze and disclose the potential impacts of Fences Harming Special Status Wildlife.
5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.	27. Please state whether the MARGIN of ERROR is measured or assumed.	If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.	28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.	Birds that fly close to the ground can be harmed and killed by fences.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.	29. Please list all potential CUMULATIVE impacts related to this one.	QUANTIFICATION OF BASELINES AND IMPACTS:
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.	30. Please describe all potential CUMULATIVE impacts related to this one.	This impact appears to be potentially significant.
9. Please state the variance's MARGINS of ERROR or confidence level.	31. Please quantify all potential CUMULATIVE impacts related to this one.	1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Fences Harming Special Status Wildlife.
10. Please state whether this MARGIN of ERROR is measured or assumed.	32. Please list, describe and quantify all potential compound and synergetic impacts.	1b. If no objective criteria are used please state that clearly.
11. If an average is used, please state which kind of average.	33. Please list, describe and quantify all Construction impacts related to this one.	2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
12. Please state the most extreme values which could be encountered.	34. Please list, describe and quantify all Growth impacts related to this one.	3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.	35. Please list, describe and quantify all Indirect impacts related to this one.	3b. Please quote the definition used.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.	36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.	4. If no measurement units are used please state that clearly.
15. Please provide a graph of HISTORICAL measurements.	37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.	5a. Please state the METHOD of measurement used to determine the significance for each criteria.
16. Please quantify the length of time this impact would last.	38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.	5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.	39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.	6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.	40. Please state whether the margin of error is measured or assumed.	7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.	41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.	8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
20s. Please state whether this MARGIN of ERROR is measured or assumed.	42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.	9. Please state the variance's MARGINS of ERROR or confidence level.
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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	46. Please provide the reverse of this impact as Mitigation.	13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
24. Please state whether the MARGIN of ERROR is measured or assumed.	47. Please provide an ALTERNATIVE which avoids this impact.	14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.	48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.	15. Please provide a graph of HISTORICAL measurements.
	-	16. Please quantify the length of time this impact would last.
	* 134 - FENCES HARMING SPECIAL STATUS WILDLIFE.	17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
	The Document appears to have ignored this potentially significant Impact.	

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 135 - ENHANCEMENT OF ALIEN SPECIES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Enhancement of Alien Species.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Biological pollution" of exotic or non-native species can cause the loss of habitat for ESA listed plants and animals. "More than 1000 exotic plants have been introduced in [California] since 1769. Eucalyptus is one of about 50 plants that have escaped cultivation and now run roughshod over wild areas." Associated Press Sept. 26 1999

Bulldozing, including new road cuts and clearing old roads, leaves
an excellent opportunity for introduction and enhancement of Pampas type
grasses and Scotch and French Broom.

"In the Coastal fog belt of California, from Monterey County northward,
Pampas type grasses and Scotch and French Broom are invading DISTURBED
soils, grasslands, open woodlands and roadsides. They crowd out native
plants and wildflowers, changing the appearance of the natural
landscape, decreasing the food and habitats of wildlife and creating
what many consider an eyesore." (Invasive Exotic Plants in Monterey
County, brochure by Monterey County Planning Dept. #293-0274 4/98)

California harmful exotics and non-natives include:
French Broom (Cytisus monspessulanus)
Pampas Grasses (Cortaderia jubata and Cortaderia
sellowiana)
Scotch Broom

"Broom forms dense thickets in many habitats, shading out native flora
and tree seedlings and can limit access to recreational trails for
hiking, fishing and horseback riding." (Invasive Exotic Plants in
Monterey County, brochure by Monterey County Planning
Dept. #293-0274
4/98)

Bullfrog - eats tadpoles of the federally listed California Red-Legged
Frog (Rana aurora draytonii).

Bluegum Eucalyptus - which sheds bark and leaves, chokes out native
plants reducing food for owls, deer and other animals. They spread so
quickly they become fire hazards contributing to the Oakland Hills fire
in 1991 which killed 16 people and destroyed 3000 homes.

Green Crab (Carcinus maenas) - eats native clams, oysters and other
crabs. It threatens some birds, fish and other crabs by eating their
food supply.

Hydrilla (Hydrilla verticillata) - clogs waterways, blocks light for
other plant species and reduces fish spawning and feeding areas.

Flathead Catfish - eats chiefly other fish including endangered species.
Dandelions

Nutria - "devastating wetlands and habitat for Bald Eagles"
AP Sept. 26
1999.

"Rats and feral cats have eliminated ground nesting birds in many areas,
including Jamaica, Australia, New Zealand, and the Galapagos Islands."
Environmental Science; Morgan, Moran & Weirsm; W.C.
Brown Pub. 1993

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Enhancement of Alien Species.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 136 - IMPORTING NON-NATIVE SPECIES AS MITIGATION.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of

Importing non-native species as Mitigation.

"In Hawaii, the carnivorous rosy wolf snail was imported to kill the giant African tree snail. Instead it has pounced on 800 local mollusk species, driving more than 50 to extinction since the mid-1950's" AP Sept 26 1999

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* 137 - TRAILS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Trails.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Trail use by humans can cause erosion, wildland and forest fires, introduction of invasive and exotic species, harassment of and deaths of wildlife including birds, damage to wildlife burrows, spread of exotic disease bearing feces, increase in disease transmitting flies and harm to tree roots, littering and dust.

Dogs chase, harass and kill wildlife including birds, dig up wildlife burrows and spread invasive disease bearing feces. Dogs can cause loud annoying noise by barking (85 dbA). Pets are often prohibited from US National Park trails (i.e. Kings Canyon Nat. Park).

Pack animals (Horses/burros/mules/donkeys/llamas) can cause significantly more trail and wilderness damage than humans alone. They have a higher weight per square inch and a higher total weight load which can turn soils to dust and kill all plant and microscopic biota in the trail corridor. They often travel in trains of many animals, kick up significantly more dust than human hikers, can stampede and endanger humans, cut and sever tree roots and leave huge quantities of feces which attract and breed flies which transmit diseases to humans and wildlife.

Please quantify the daily feces load introduced into the area.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Trails.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 138 - FECES CAPTURE SYSTEM.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Feces Capture System.

Pack animal and pet feces can be easily captured or removed by the human in control of the animals. Pack animals can be fitted with a bag to capture feces before it hits the ground. Dog feces can be gathered in plastic bags after they defecate. Some cities (New York, NY; Carmel, CA) require such efforts.

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* 139 - HUMAN CREATED TRAILS MAKING STREAMS CAUSING EROSION.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Human Created Trails Making Streams Causing Erosion.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Trails made by wildlife, especially ungulates normally traverse a slope at a given altitude, rarely significantly ascending or descending a slope. In contrast human created trails often go directly up or down a slope causing loss of vegetation and literally creating new streams and associated erosion.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Human Created Trails Making Streams Causing Erosion.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 140 - HUMAN CREATED TRAILS HARMING TREE ROOTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Human Created Trails Harming Tree Roots.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Human created trails near trees and in forests often exposes roots of trees to the air. The roots are further damaged by continued abrasion from human walkers (Pt. Lobos has many examples of tree roots exposed and now damaged by trails. Tree roots need mycorhyzie fungi to help trees absorb water and phosphorus. When tree roots are exposed from trails over them the mycorhyzie fungi on exposed tree roots dies due to abrasion, exposure and lack of water and the tree suffers. - Biology (textbook 1984), H. Curtis pg 452

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Human Created Trails Harming Tree Roots.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
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33. Please list, describe and quantify all Construction impacts related to this one.
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35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
- * 141 - LAWNS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Lawns.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- Daily cutting of thousands of acres of golf courses and weekend cutting
of hundreds of thousands of urban household lawns can release
significant amounts of VOCs and carcinogenic air pollution.
- The drying of lawn clippings released formaldehyde, methanol, acetydehyde, acetone and other gases. The drying of millions of acres
of cut alfalfa "could be quite a point source of [Volatile Organic
Compound (Ozone precursor) pollution]." SciNews Apr 3, 99
citing
Geophysical Research Letters, April 1, 99
- "Nationwide, lawns cover 25 to 30 million acres, an area larger than
Virginia, and suburbanites use up to two and a half times more pesticides
per acre than do farmers to keep their lawns weed free." US
News and
World Report July 29 1991.
- Those lawn pesticides and fertilizers run off into streams - the
- pesticides harming aquatic life and the fertilizers enhancing algal blooms.
- Lawns need lawnmowers (many lawnmowers barely start because they are so badly tuned) which spew out large amounts of unregulated and unburned
air pollution fumes.
- Lawn clippings are normally sent to the town dump rather than used
as compost.
- The drying of lawn clippings released formaldehyde, methanol, acetydehyde, acetone and other gases. The drying of millions of acres
of cut alfalfa "could be quite a point source of [Volatile Organic
Compound (Ozone precursor) pollution]." SciNews Apr 3, 99
citing
Geophysical Research Letters, April 1, 99
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Lawns.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 142 - INTRODUCED (INVASIVE) SPECIES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Introduced (Invasive) Species.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Invasive species are those which were not previously known in an ecosystem and then out compete native species sometimes causing their extirpation or extinction.

In the late 1980s, zebra mussels (*Dreissena polymorpha*) invaded Lake St. Clair, probably hitchhiking in the ballast water of a commercial ship arriving from Europe. Within a few years, they were abundant enough to temporarily shut down the water supply of Monroe, Michigan. Power plants, water treatment facilities, and factories in New York, Ohio and Michigan faced drastic reductions in their water intake due to mussel-clogged pipes. Total projected costs turned out to be between \$750 million and \$1 billion.

Scientists estimate that about 7,000 invasive species of plants,

mammals, birds, amphibians, reptiles, fish, arthropods and mollusks are now established in the United States. Examples range from the chestnut blight - which killed almost every American chestnut on the continent within a few decades - to more recent problems, such as zebra mussels, purple loosestrife, leafy spurge, yellow starthistle, the Asian long-horned beetle, and whirling disease in salmon and trout. These species cost billions of dollars annually in damage and control measures. - Union of Concerned Scientists

"The greatest single paroxysm of extinction ever recorded" was caused by stocking Lake Victoria with the aggressive Nile Perch in the 1960's. This single species led to the disappearance of as many as 200 species of native cichlid fish.

Other disastrous introductions include the rosy wolf snail which led to at least 15 Hawaiian endemic snail species; and the brown tree snake to Guam which is the probable primary cause of 9 native birds, 5 native lizards and 2 of only 3 bat species. "The Science of Invasive Species" Nov 2001 report, Union of Concerned Scientists.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Introduced (Invasive) Species.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

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* 143 - URBANIZATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Urbanization.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Cities cause measureable climate impacts compared to rural areas.

Temperature -
Annual mean 0.5 - 30 deg. C more

Humidity -
Annual mean 6% less

Contaminants -
Particulates 10 times more
Gaseous admixtures 5-25 times more

Cloudiness -
Fog, winter 100% more
Clouds 5-10% more
Thunderstorms 10-15% more

Sunshine duration 5-15% less

- Cambridge University Press 1993 FactFinder

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Urbanization.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 144 - COMMERCIAL SPACE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Commercial Space.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Commercial Space generates 35 average daily one way trips per 1000 square feet of floor space according to City of Monterey Final Environmental Impact Report on the Rohr Hotel, 1983.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Commercial Space.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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* 145 - GOLF COURSES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Golf Courses.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Golf Courses have adverse environmental impacts including high water use, fertilizer runoff, pesticide harm, air pollution and soil erosion.

"The potential detrimental effects associated with golf course

construction and maintenance have been identified as the following:
(from USGA's 1993 book "Golf Course Management and Construction" p 22)

1. Contamination of surface water with sediment and nutrients during turfgrass construction.

2. Potential contamination of runoff water and groundwater with applied nutrients and pesticides.

3. Development and resurgence of pest populations with increasing resistance to chemical control.

4. Potential negative impacts of chemical management on beneficial soil and nontarget organisms.

5. Potentially toxic effects of applied chemicals to nontarget plants and animals.

6. Excessive use of water resources during drought conditions and in semiarid and arid climatic zones.

7. Loss or degradation of wetland resources during construction and turfgrass maintenance." pgs 22-23

Other impacts include -
"the potentially toxic effects of applied chemicals on beneficial nontarget soil organisms and aquatic systems, degradation of stream and lake quality resulting from sediment, chemical and thermal pollution, disturbance and toxicity impacts on wildlife."
-Preface to Golf Course Management and Construction

"As a whole, I think anytime you open a new public course, you take away 40,000 rounds from other courses," said Rancho Canada head professional Todd Ponti. Herald, Mar 14, 2001 Joe Priddy, director of golf at Bayonet/Black Horse facility and R.J. Harper of Pebble Beach Co agreed.

The National Golf Foundation 2000 report "A Strategic Perspective on the Future of Golf" shows that "during the 1980s there were more golfers than golf courses. Within the past 10 years however, the continued introduction of new courses has forced supply higher than demand."

The drying of lawn clippings released formaldehyde, methanol, acetylidehyde, acetone and other gases. The drying of millions of acres of cut alfalfa "could be quite a point source of [Volatile Organic Compound (Ozone precursor) pollution]." SciNews Apr 3, 99 citing Geophysical Research Letters, April 1, 99

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Golf Courses.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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16. Please quantify the length of time this impact would last.

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* 146 - HOTELS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Hotels.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Hotels cause an increase in traffic, air pollution, noise, and light pollution and a decrease in water supplies and impermeable surfaces.

Hotels generate seven (7) average daily one way trips per hotel room according to City of Monterey Final Environmental Impact Report on the Rohr Hotel, 1983.

Meeting Rooms generate 38 average daily one way trips per 1000 square feet according to City of Monterey Final Environmental Impact Report on the Rohr Hotel, 1983.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Hotels.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 147 - RESTAURANT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Restaurant.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Restaurants use water, parking capacity, traffic capacity, can generate solid waste for landfills, grease pollution in sewer lines, light pollution, noise pollution.

Restaurants generate 2.5 average daily one way trips per seat according to City of Monterey Final Environmental Impact Report on the Rohr Hotel,

1983.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Restaurant.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 148 - SEWER LINE EXTENSION.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Sewer Line Extension.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Extending sewer lines induces growth.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Sewer Line Extension.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 149 - NATURAL SEWAGE SYSTEM.**

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Natural Sewage System.

An alternative sewer treatemnt plant in the town of Benton uses a rock-reed filtration system. It has no unpleasant odor, needs no tons of concrete or miles of iron pipe or massive mechanical equipment, uses almost no electricity and no chemicals. It does not breakdown and interrupt service. Audubon's 1994 Almanac of the Environment. pg 29

Arcata California hasa natural sewage treatment system.

This Alternative does not require any non-off-the shelf technology.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 150 - STORAGE FACILITIES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Storage Facilities.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

As affordable housing decreases (rent and home price per square foot rising) - residential storage needs increase.

Mini-storage facilities (6 foot by 6 foot - up to house size) consume several acres of land per project, don't offer much revenue, are last in job creation and gobble up prime commercial and industrial zoning areas.
- Salinas & Marina City officials quoted in Herald article Mar 29 2000

Salinas' thriving mini-storage market comes primarily from migrant farm workers and people who own small homes.

Service stations bring in \$1.50 per square foot in taxes, while mini-storage facilities only bring in about \$0.02 per square foot.

The national average for mini-storage is about 3.5 square feet per resident. Marina averages 10 square feet / resident.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Storage Facilities.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 151 - PARKING CAPACITY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Parking Capacity.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

As Parking availability decreases governments typically pass increasingly
stronger measures to limit parking and charge for it.
In rural areas parking limits and costs are negligible.

Usually the first parking restriction action taken is to paint lined
parking spaces. Sometimes a decision between diagonal and parallel
parking occurs.

A second stage is to limit parking time in lined spaces. The city then
begins to get revenue with parking tickets.

A third stage is to install parking meters. City revenue jumps.

A fourth stage is building parking lots.

MUSICAL (Parking) CHAIRS
Moving Parking Problems from one place to another does not reduce
cumulative parking demand. A given street in a neighborhood can only
park so many cars at one time. Once that threshold is reached - any
further increase in parking demand is like the game of musical chairs.
Once a specific block, street or neighborhood has reached or exceeded
its capacity limit for parking, the addition of a single car wishing
to park is a significant impact. That additional car must park further
than the local area thus impacting other areas which may have parking
capacity problems as well or diminishing the other area's parking spaces.

Three types of Parking
Free parking, Paid Public Parking and Private Parking

Please define parking capacity in spaces per block.

Please identify which blocks, streets and neighborhoods have reached
or exceeded their Free parking capacity.

Please identify which blocks, streets and neighborhoods have reached
or exceeded their Paid Public parking capacity.

If there is any free public parking capacity remaining, please explain how that remaining will be proportioned out to residential
uses, public uses and for commercial or other intensive uses.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Parking Capacity.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 152 - PARKING DURATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Parking Duration.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Parking has at least two independent dimensions, each of which must be accounted for - the number of spaces and the time parked in each space.

Parking Duration is an additional dimension of parking - it is independent of the number of parking spaces.

To illustrate - if you have 10 parking spaces that are only used for 5 - 10 minutes each (such as at a Post Office), you can accommodate between 60 to 120 vehicle parking events per hour.

On the other hand if each vehicle parks for an hour, you can only accommodate 10 vehicles parking per hour. The remaining 50 to 110 vehicles exceed the parking capacity and overflow parking into other areas.

The IMAX theatre proposed for Cannery Row claims that 85% to 90% of their attendees would come from people already visiting the Aquarium and so no (or extremely few) additional parking spaces are needed.

The fallacy is that in order to visit both places - they have to park longer. This would exceed the parking capacity of Cannery Row and overflow parking into other areas.

How will the average length of (parking) stay increase as a result of the proposed project?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Parking Duration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 153 - TOTAL PARKING DEMAND INCREASE DUE TO GROWTH.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Total Parking Demand Increase Due to Growth.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

More houses mean more cars, which mean more parking demand.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Total Parking Demand Increase Due to Growth.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 154 - FREE-PARKING DEMAND INCREASE DUE TO GROWTH.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Free-Parking Demand Increase Due to Growth.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Carmel, Monterey and Pacific Grove parking is beyond capacity as evidenced by the issuance of neighborhood parking passes by all three towns.

People often increase neighborhood traffic when trying to find free parking.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Free-Parking Demand Increase Due to Growth.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 155 - PAID-PARKING DEMAND INCREASE DUE TO GROWTH.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Paid-Parking Demand Increase Due to Growth.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Carmel, Monterey and Pacific Grove parking is beyond capacity as evidenced by the issuance of neighborhood parking passes by all three towns.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Paid-Parking Demand Increase Due to Growth.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 156 - PRIVATE PARKING DEMAND INCREASE DUE TO GROWTH.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Private Parking Demand Increase Due to Growth.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Carmel, Monterey and Pacific Grove parking is beyond capacity as

evidenced by the issuance of neighborhood parking passes by all three towns.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Private Parking Demand Increase Due to Growth.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 157 - HOTEL PARKING.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Hotel Parking.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Five parking spaces per thousand square feet of retail shops is a measure typically used by California cities.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Hotel Parking.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 158 - CONSTRUCTION PARKING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Construction Parking.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Parking needs increase during construction.

Construction vehicles, construction support vehicles, and construction worker's personal vehicles need to park somewhere and can fill a

residential street's parking spaces. This impact is real, however temporary it is. On the other hand some construction can last 15 years or more (Cannery Row's Rohr Hotel or Gin Wong in Monterey California).

Construction of a single house on Arena Ave. in Pacific Grove, California drew some 22 parked trucks and cars, a trailer and one heavy construction vehicle - a backhoe. The vehicles parking on both sides of the street reduced the road from two lanes to one. Only one vehicle was parked off road in the driveway.

Please list and quantify all construction vehicles types (e.g. trucks, bulldozers, backhoes, delivery vehicles and their trailers, cranes) which will use on street parking and the duration of their stay in maximum days.

What is the maximum number and average number of employee vehicles which will use offsite parking at the project site.

What is the maximum duration of construction?

Please use these criteria to measure this impact: mapped area of parking, vehicle lengths, number of occurrences per day per vehicle, rate, duration of parking per vehicle.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Construction Parking.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 159 - PARKING LOTS CAUSING TRANSIT AND PEDESTRIAN IMPACTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Parking Lots Causing Transit and Pedestrian Impacts.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

"Large expanses of land devoted to parking make it difficult to achieve transit and pedestrian friendly design. Where large parking lots are necessary, breaking them up into pedestrian-scaled blocks, complete with curb, sidewalk and landscaping promotes a pedestrian friendly environment." Department of Transportation letter June 3, 1996 to City of Capitola on Capitola Crossing Project.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Parking Lots Causing Transit and Pedestrian Impacts.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 160 - DELIVERY VEHICLE PARKING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Delivery Vehicle Parking.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Delivery vehicles almost always use diesel engines.
Delivery vehicles often leave their engines running during deliveries.
Stopped, running Delivery vehicles have impacts from the exhaust, noise
and "parking" if you can call stopping in a roadway parking.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Delivery Vehicle Parking.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 161 - SPECIAL EVENT PARKING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Special Event Parking.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"There's a special event here just about every single weekend."
According to Brian Borgia owner of Monterey Peninsula Reservations in a
July 3 1999 Herald article. Borgia also said the Concours in August and

the Indy Cars in September are the area's biggest hotel sellers.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Special Event Parking.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 162 - TOURIST PARKING.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Tourist Parking.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

The neighborhoods surrounding the Aquarium are so impacted from parking that Monterey, Pacific Grove and Carmel have instituted residential parking permits. The parking along the ocean side of Pacific Grove's portion of the coast walkway from Lover's point to about 4th street is filled with parked cars almost every weekend of the year. Some degree of that parking impact is from Aquarium employees, volunteers and customers.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Tourist Parking.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 163 - HOLIDAY PARKING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Holiday Parking.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Tourist areas, such as the Monterey Peninsula, advertise to get more business during holiday weekends. The increased number of visitors increases the parking demand and decreases the available parking.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Holiday Parking.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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* 164 - RESIDENTIAL PARKING INTRUSION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Residential Parking Intrusion.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Downtown Carmel has long been avoided by locals because the traffic and parking downtown is unavailable. This has pushed commercial parking into neighborhoods without commercial uses (e.g. Casanova btw Ocean and 4th).
This is recognized in the General Plan pg 2-24

Commercial parking intruding into residential areas is strictly forbidden by Carmel's Ordinance 29 "business development should forever be subordinate to the residential character of the community." General Plan pg 1-8.
Business zoning density must be reduced until this conflict is eliminated.
As a contrast - beach parking which intrudes into residential areas does not conflict with Ordinance 29 because beach parking is not commercial.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Residential Parking Intrusion.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 165 - PARKING SPACE PAVING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Parking Space Paving.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Paved Parking Spaces increase impervious surface areas. Asphalt (vs concrete) paved areas cause oil runoff and hydrocarbon air pollution.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Parking Space Paving.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 166 - VALET PARKING.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Valet Parking.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Valet parking increases the risk of automobile accidents as the valets typically drive much faster than normal traffic.
- QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Valet Parking.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 167 - CAPACITY INCREASE OR REDUCE TRAFFIC CONGESTION.

"You Can't Pave your way out of Congestion."

Building more lanes to cure congestion is like loosening your belt to cure obesity.

1) There is now overwhelming evidence, including a nationwide study of 70 metropolitan areas over 15 years (Texas Transportation Institute), another California specific study (Hansen 1995) which included Monterey County, that when an area is congested - additional lanes do not provide congestion relief.

2) It is also well documented that additional lanes increase traffic.

3) Further experience shows that "When road capacity shrinks - So Can Traffic" (e.g. San Francisco's Central Freeway in 1996, New York's West Side Highway 1988) - Auto Free Times Winter 1996-97.

Thus the proposed project seems contrary to the stated project goal to relieve congestion.

According to Monterey County Director of Public Works, Lew Bauman, the County will have to spend \$200 - \$220 million dollars simply to bring County roads up to acceptable standards. This is not capacity increasing nor safety improvements - just repairs. (TAMC minutes Oct 27, 1999)

This reduces the feasibility of any capacity increasing or safety improvement project.

Please explain clearly how this project will deal with these concerns.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Capacity Increase or Reduce Traffic Congestion.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Capacity Increase or Reduce Traffic Congestion.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Capacity Increase or Reduce Traffic Congestion.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Capacity Increase or Reduce Traffic Congestion.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Capacity Increase or Reduce Traffic Congestion.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Capacity Increase or Reduce Traffic Congestion.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 168 - SPEED LIMITING SIGNALS TIMING.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Speed Limiting Signals Timing.

Traffic Signals can be timed to limit speed to legal levels.

-

* 169 - AESTHETIC VALUES.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Aesthetic Values.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

The attraction and appreciation (or repulsion) of sensual phenomena. They include visual beauty of landscapes, fragrances (or odors), birdsongs (or chainsaws), flowing water and music, the texture and resiliency of tree bark or forest floor, or the taste of wild fruit.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Aesthetic Values.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 170 - HUMAN STRESS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Human Stress.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Stress Is Real
Human stress is not merely documented as fact it is legally recognized in law as "Intentional Infliction of Emotional Distress."

Fear of psychological harm makes a crime harsher. See PEOPLE v. NGUYEN (5/4/00 - No. S072471) 9th District Federal Court of Appeals "Penal Code §209(b) is not limited to forced movements of the victim that substantially increase the risk of bodily or physical harm. Risk of psychological harm may also be used to elevate kidnapping to aggravated kidnapping."

Loss of comfort (e.g. housing, silence) or increased adverse stimulation (e.g. noise, light) can cause stress.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Human Stress.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 171 - SILENCE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Silence.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Silence is a very different issue than noise. Noise is unwanted sound, while Silence is a valuable positive resource.

Silence can be mapped as those areas which experience continuous periods where no man-made sounds exceed 35 dBA.

Cicadas and frogs can often be heard for as much as a half mile, but they are not human caused noise.

Silence is extremely rare on the Monterey Peninsula. This proposal would greatly diminish the acreage of silent forest. I have measured the ambient sound level in Jeffers Forest at 14 dbA during fog at about 4:30 am. I can personally testify that is quieter than the softest whisper. The minimum continuous sound in Jeffers Forest is below 30 decibels.

To me personally, the natural undamaged-by-human silent serenity of observing the natural Monterey Pine Forest in Pebble Beach from inside it is an astounding natural resource.

Please disclose the quality and quantity of current silence for each of the affected forest areas and how it would change with each of the proposed actions.

Please provide a map of current maximum daily sound levels and please provide a separate map of current minimum daily sound levels with 10 decibel "topographical" lines for the entire project area and the entire peninsula. Please map "topographical" sound levels lines down to the minimum measured sound level 20 decibels.

Please map the change in maximum and minimum sound levels in the project area during construction.

Please map the change in maximum and minimum sound levels in the project area after the different phases of the project are completed.

Please discuss the change in current sound levels on existing trails in the project area and the difference after the project would be completed.

Please describe the aural conditions now existing in the forest from underneath the canopy, before any construction.

Please detail the aesthetic values that would be lost from the existing trails.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Silence.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
- 30 Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 172 - OFFENSIVE ODORS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Offensive Odors.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- Non-toxic Odors can cause nausea and loss of appetite.
- An odor detection threshold can be far above or below harmful effects.
Carbon Monoxide is odorless yet deadly. Hydrogen Sulfide can be detected
- at 0.0047 ppb, yet OSHA claims it is not harmful until it reaches a level of 10.0 ppb.
- Ozone's odor threshold starts between 0.02 and 0.05 ppm, irritation of the nose and throat at 0.05 ppm, and dryness of the throat above 0.1 ppm.
- "Nitrogen Dioxide's odor threshold is between 1 and 3 ppm; nose and throat irritation has been associated with 13 ppm. At concentrations of 25 ppm volunteers complained of pulmonary discomfort after five minutes of exposure."
- Sulfur Dioxide's odor threshold is about 0.5 ppm. From "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 56
- The threshold of significance should be whether an objectionable odor can be perceived beyond the limits of the minimum land area of its origin.
(This is based on threshold A.9 in the "Standard Provisions and Reporting Requirements for Waste Discharge Requirements of the Central Coast Regional Water Quality Control Board, 1984. It is essentially
The threshold of whether the odor could be considered a nuisance.)
- "For all mammals, the acuity of the sense of smell depends primarily upon the size of the 'olfactory mucosa,' a specialized area of mucous membrane located in the nose. In humans the olfactory mucosa normally totals less than a square inch in area. In the average bear, it may be one hundred times that much. Bears have been known to detect the odor of rotting carrion from as far away as ten miles." Bears, Their Life and Behaviour, Ashworth & Wolfe, Crown, 1992
- This indicates that to a bear, an offensive smell will be far less intense than to a human.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Offensive Odors.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 173 - SMELL OF HOT TAR ASPHALT ROOFING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Smell of Hot Tar Asphalt Roofing.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This smell can be highly repugnant causing many complaints to Air Districts. The smell of Hot Tar asphalt roofing can be detected beyond a mile.

Monterey Herald Headlines "Roofing Tar Trailer Explodes," "Residents Flee Salinas Vehicle Fire" Aug 5 1999
The article goes on to state "A Salinas neighborhood was evacuated as flames engulfed a roofing truck..."
"...responding firefighters quickly upgraded it to a two-alarm fire when they learned that it was a roofing truck laden with hot tar with a propane tank on board."
"Firefighters were pumping three thousand (3000) gallons a minute of water on the blaze to put it out and shield adjacent houses from the high radiant heat of the flames." The truck was owned by Williams Roofing of Castroville.
The stench of the hot tar fire saturated dozens of city blocks.

The threshold of significance should be whether this objectionable odor can be perceived beyond the limits of the minimum land area of its origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Smell of Hot Tar Asphalt Roofing.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 174 - ODOR FROM SEWAGE TREATMENT PLANT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Odor from Sewage Treatment Plant.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The threshold of significance should be whether this objectionable odor
can be perceived beyond the limits of the minimum land area of its
origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance of
Odor from Sewage Treatment Plant.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 175 - ODOR FROM SEWAGE PUMPING STATIONS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Odor from Sewage Pumping Stations.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Pacific Grove has several Sewage Pumping Stations which constantly emit
an objectionable odor.

The threshold of significance should be whether this objectionable odor
can be perceived beyond the limits of the minimum land area of its
origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Odor from Sewage Pumping Stations.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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* 176 - ..

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of ..

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of ..

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 177 - CREOSOTE SMELL.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of Creosote Smell.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Creosote is a known carcinogen on California's Prop 65 list. Creosote also has a powerfully repugnant smell that lasts years and on hot days can be repugnant dozens of meters from the source.

The threshold of significance should be whether this objectionable odor can be perceived beyond the limits of the minimum land area of its origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Creosote Smell.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 178 - BIOFILTRATION ODOR REDUCTION.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Biofiltration Odor Reduction.

Biofiltration is widely used in slaughterhouses and cocoa roasting plants to remove odors. It is especially good at removing organic odors and VOCs.

* 179 - NATURAL FOREST FRAGRANCES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Natural Forest Fragrances.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The native Monterey Peninsula pine forests contain mint plants which emit a very pleasing fragrance. The native Monterey pine forests have an attractive fragrance of their own emanating from the pine needles. Sometimes it is enhanced with the scent of natural mint in warm conditions.

I can distinguish the scent of a Monterey pine forest from a Redwood forest and a Monterey Cypress forest.

Also a Monterey pine forest smells different in the winter after a rain compared to its dry scent during a hot summer afternoon.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Natural Forest Fragrances.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 180 - NATURAL FOREST VISUAL BEAUTY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Natural Forest Visual Beauty.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

To me personally, the visual beauty, the natural undamaged-by-human design - serenity of observing from inside the existing Monterey Pine Forest in Pebble Beach is an astounding natural resource.

Please describe the visual conditions now existing in the forest from underneath the canopy, before any construction.

Please describe the 360 degree views through the forest that extend for enormous distances without any sign of humanity.

Please include the "Visual Resources Map" identified in County Policy 51. I suspect that parts of the P/Q/R area would be eligible for designation on the map.

Please define "Public viewing area" as described in Coastal Implementation Plan Section 20.147.070.C3 I suspect that much of the P/Q/R area is ridgeline development.

Given that the photos can not be taken from every angle, to depict before and after thoroughly, please include aerial photographs of each subdivision (before) with computer enhancement to depict the buildout (after).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Natural Forest Visual Beauty.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 181 - NATURAL SEASCAPE VISUAL BEAUTY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Natural Seascape Visual Beauty.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

To me personally, the visual beauty, the natural undamaged-by-human design - serenity of observing the ocean without large ships, Cruise Ships, is an astounding natural resource.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Natural Seascape Visual Beauty.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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33. Please list, describe and quantify all Construction impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 182 - SUNLIGHT BLOCKING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Sunlight Blocking.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Human created structures can block sunlight from vegetation, reducing photosynthesis, weakening vegetation and algae and allowing competitors and predators to reduce their numbers. Sunlight Blocking can be especially harmful to ecotones (e.g. buildings blocking sunlight from shores of lakes, rivers or intertidal habitat of oceans) as ecotones hold a larger number of, and abundance of, species.

Please measure area in acres shaded, and hours of shade. A useful measure is acre-hours of shaded area.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Sunlight Blocking.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 183 - PERMANENT HARM TO COMMUNITY VISUAL AESTHETICS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Permanent Harm to Community Visual Aesthetics.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- A more visually attractive community is more satisfying to live in.
It also increases property values.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Permanent Harm to Community Visual Aesthetics.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 184 - THE VISUAL INSULT OF A GOLF COURSE IN A WILD AREA.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
The Visual Insult of a Golf COurse in a Wild Area.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
The Visual Insult of a Golf COurse in a Wild Area.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 185 - LIGHT POLLUTION OR LIGHT TRESPASS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Light Pollution or Light Trespass.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Light pollution is unwanted light, both direct and indirect.

When an artificial light shines directly onto another property, including public access areas, it has an adverse impact called light pollution or Light Trespass. Indirect light can also have an adverse impact - especially if surfaces reflecting it are shiny or mirrored.

LIGHTING FAILS TO DETER CRIME

"Lighting has received considerable attention. Yet, evaluation designs are weak and the results are mixed. We can have very little confidence that improved lighting prevents crime, particularly since we do not know if offenders use lighting to their advantage. In the absence of better theories about when and where lighting can be effective, and rigorous evaluations of plausible light interventions, we cannot make any scientific assertions regarding the effectiveness of lighting."
-National Institute of Justice, 1997, report to Congress, Chapter 7.

Example: The intense green lights used by squid and sardine fishing boats in the late 1990's caused light pollution for every house in New Monterey and Pacific Grove with a view of Monterey Bay.

Example: For ten years until the condominiums were built, the Spanish Bay parking lot lit up the entire Asilomar Beach, and glared all night long, along the entire western seafront of Pacific Grove. The light shined in the windows of homes and cars. It directly shined in the eyes of beachwalkers. The glare could be seen distinctly for at least 20

miles out to sea. That specific glare can be seen distinctly from the air, flying over Santa Cruz, Carmel Valley and Big Sur.

The County of Monterey has several intense and unnecessary light pollution sources including --

* the Dole warehouse just south of the Salinas River just east of Highway 1, which can be seen from the Monterey Peninsula and from Moss Landing,

* the Point Sur Lighthouse beacon which intrudes on the wilderness and does not need to shine on shore. The Pigeon Point Lighthouse is an example of a lighthouse which does not shine onshore.

* Soledad Prison which is in the city of Soledad, but the County can request their help in alleviating this problem.

The City of Monterey has several significant light pollution sources including --

* Two baseball parks, one at lake El Estero and the other off Franklin street closer to downtown. The blazing lights from these lights can be seen, and cast shadows, for miles.

* The Presidio of Monterey also has blinding uncontrolled light from its sports field near Pacific Grove's Presidio road and Highway 68 which can be seen miles away on the shore roadways of Pebble Beach.

All of these light sources can provide 100 percent of their intended illumination when using shielding which prevents offsite light pollution.

Please measure and detail the visual pollution from direct light sources at night and its impact on neighbors and wildlife.

Please measure and detail the visual pollution from indirect light sources at night and its impact on neighbors and wildlife.

Thresholds of significance include whether the light is bright enough to create shadows on another property or could be considered a nuisance.

Please use these criteria to measure this impact: mapped area of impact, duration of impacts.

Labware Direct (1 800 356 0783) sells light meters measuring as low as 0.1 to 5,000 foot candles and 0.1 to 50,000 Lux.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Light Pollution or Light Trespass.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,

credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the

baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 186 - NIGHT SKY GLARE INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Night Sky Glare Increase.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Have you looked up at night lately? The universe is going away, gone already for many. The universe is an important part of the environment, to astronomy and to the general public. For most people on earth, the dark skies our ancestors had have disappeared. The problem is urban sky glow, due mostly to too much bad lighting."

"With good lighting, we all win. We help preserve the dark skies, we see better (and are safer and more secure), we have a more pleasant and comfortable nighttime environment, and we save a great deal of energy and money doing so. Neither astronomers nor the public, anywhere, need any of the adverse environmental effects of poor lighting."
- The International Dark Sky Association (IDA)

Glare from light at night can be an enormous nuisance.
"Glare never helps visibility, but it is far too common in all of our cities. We should strive for a glare free environment."

"A trashy looking, confusing nighttime environment. We should, all of us, be striving for a good looking nighttime environment, just as we should be doing in the daytime. Such poor environments are part of the stress of today's life. We should help with the problem, not compound it. Remember, the night is part of the environment too." - IDA

National Parks experience light pollution from city lights more than 100 miles away. Artificial light pollutes nearly two-thirds of the U.S.'s national parks that allow overnight stays. - National Parks and Conservation Association (www.npca.org)

At least 30 percent of the energy powering outdoor lighting in the U.S. is wasted. The U.S. could save \$1.5 billion per year if that waste was eliminated.

Under ideal conditions you can expect to see as many as 15,000 stars with your naked eye in the night sky in the U.S. In a typical U.S. suburb only 200 to 300 will be visible. In a major metropolitan area, you're lucky to see two dozen stars on a clear night. - IDA

Please use the number of visible stars as a measure of light glare.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Night Sky Glare Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 187 - WINDOW AND SKYLIGHT ONE-WAY FILM.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Window and Skylight One-Way Film.

Windows and Skylights can have one-way "mirror" film applied on the inside to greatly reduce light leakage to the outside, perhaps as much as 95% reduction.

* 188 - VEHICLE LIGHT AND GLARE INCREASE ON SURROUNDING RESIDENCES.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Vehicle Light and Glare Increase on Surrounding Residences.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

When vehicle lights directly shine onto another property - it has an adverse impact called Light Trespass. Indirect light can also have an adverse impact.

Thresholds of significance include whether the light is bright enough to create shadows on another property or could be considered a nuisance.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Vehicle Light and Glare Increase on Surrounding Residences.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 189 - LIGHT AND GLARE INCREASE ON WILDLIFE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Light and Glare Increase on Wildlife.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Wildlife habits can be dramatically changed by lights.
Consider the
flights of a moth near a single outdoor bulb.

BIRDS:
Sidney Gauthreaux of Clemson University discovered that
"bright lights
shining from tall buildings or reflecting off low clouds can confuse
migratory birds on their way to breeding grounds." cited in
Backpacker
magazine, Aug 1999, p 31

"The British Trust for Ornithology estimates that at any given
hour on
any given night, 10,000 English Robins are serenading a
false dawn."
Ibid

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the
objective
(non-subjective) CRITERIA used to determine the impact
significance of
Light and Glare Increase on Wildlife.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe
how the threshold of significance chosen is scientifically
testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS
(numbers) used to determine the significance for EACH
criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to
determine the significance for each criteria.

5b. If no method of measurement was used please state that
clearly for each criteria and explain thoroughly how the data
was obtained.

6. Please quantify the existing or current BASELINE
measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level
and whether the MARGIN of ERROR is measured or
assumed.

8. Please state the VARIANCE or fluctuation, assumed or
expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or
confidence level.

10. Please state whether this MARGIN of ERROR is
measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be
encountered.

13. Please describe and quantify which criteria and
ASSUMPTIONS the Impact Significance predictions are
most SENSITIVE.

14. Please analyze and quantify how sensitive those
predictions are to reasonably foreseeable varying criteria and
assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time
period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the
impact changes from significant to less-than-significant and
the clear criteria and rationale for that
number.

19. Please provide the MARGIN of ERROR used (in percent
and absolute amount) for measuring the Significance
THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is
measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the
impact changes from LEGAL to ILLEGAL for ALL related and
potentially relevant local, state and federal
laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP
with increasing input, other impacts have complex non-linear
relationships. Please provide a graph that shows
whether the relationship is linear or otherwise - when at and
near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM
CHANGE, to which the IMPACT could raise or lower the
baseline number and its MARGIN of ERROR or confidence
levels.

24. Please state whether the MARGIN of ERROR is
measured or assumed.

25. Please state whether this total PERCENT maximum
change is an AVERAGE amount, a worst case expected or a
best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to
which the impact would raise or lower the baseline number
and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is
measured or assumed.

28. Please state whether this total maximum change amount
is an AVERAGE amount, a worst case expected or a best
case expected.

29. Please list all potential CUMULATIVE impacts related to
this one.

30. Please describe all potential CUMULATIVE impacts
related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 190 - SKY AND STAR VISIBILITY LOSS FROM NIGHT SKY GLARE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Sky and Star Visibility Loss from Night Sky Glare.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Urban sky glow (the brightening skies over our heads) is destroying our view of the universe. We don't live up there in the sky; we don't need all that light up there." - The International Dark Sky Association
("is a membership based organization with members now in 56 countries

which has produced many Information Sheets discussing the issues, as well as slide sets and other material available for those who want to become informed.")

When a light directly shines into the sky it has an adverse impact.
Indirect light can also have an adverse impact - especially if the upward surfaces reflecting are shiny or mirrored (e.g. glass or water).

Spanish Bay Hotel has long lines of windows which at night greatly detract from the formerly dark beach where star viewing was possible.

Fog spreads light out upward. Even when no electric light is directed towards the night sky - fog can spread the light from a community into the sky above it

Please these criteria to measure this impact: number of applications, mapped area of impact, duration of impacts.

Under ideal conditions you can expect to see as many as 15,000 stars with your naked eye in the night sky in the U.S. In a typical U.S. suburb only 200 to 300 will be visible. In a major metropolitan area, you're luck to see two dozen stars on a clear night. - IDA

Please use the number of visible stars as a measure of light glare.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Sky and Star Visibility Loss from Night Sky Glare.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 191 - LIGHT SHADES.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Light Shades.

Require that all lighting, interior as well as exterior, be restricted with opaque shades so that only the smallest necessary exterior areas are directly illuminated. Offsite direct lighting must be prohibited as well as indirect lighting which casts a shadow.

* 192 - SHINE LIGHT DOWN AND ONLY WHERE NEEDED.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Shine Light Down and Only Where Needed.

Control the light output to locations where it is needed; don't waste it. Use quality lighting fixtures.

"It All Works. Such quality lighting design has been used for some time now in many locations. Such cities are benefiting by better lighting for their citizens, by a great deal of energy savings, and by darker skies (but not darker streets). We all really do win."
- The International Dark Sky Association ("is a membership based organization with members now in 56 countries which has produced many Information Sheets discussing the issues, as well as slide sets and other material available for those who want to become informed."
For more info "<http://www.darksky.org/ida/key/intro.html>"

* 193 - MOTION DETECTION ACTIVATED LIGHTING.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Motion Detection Activated Lighting.

Use of Motion-Detection-Activated-Lighting provides light only when needed. This could reduce unneeded lighting by up to 95 percent.

* 194 - USE LIGHTING TIME CONTROLS.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Use Lighting Time Controls.

Use time controls (or dimmers or other controls) to insure that light is only on when needed, and not on when it is not needed.

* 195 - DEED RESTRICTION PROHIBITING SKYWARD AND OFFSITE DIRECT LIGHTING.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Deed Restriction Prohibiting Skyward and Offsite Direct Lighting.

Prohibit All Direct Lighting of the Sky and neighboring properties with a Recorded Deed Restriction.

* 196 - WINDOW DARKENING FILM AND OPAQUE CURTAINS.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Window Darkening Film and Opaque Curtains.

Require that all windows be covered with a Window Darkening Film and Opaque Curtains which dramatically reduces the amount of light so that only the smallest amount of light leaks outside buildings.

Spanish Bay Hotel has long lines of windows which at night greatly detract from the formerly dark beach where star viewing was possible. It is an unignorable distraction.

* 197 - MINIMIZE GLARE.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Minimize Glare.

Design and install lighting to insure that glare is minimized. Most all glare comes from poor fixtures or poor installations. There is no need for any of it.

* 198 - PROHIBIT EXCESSIVE LIGHTING.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Prohibit Excessive Lighting.

Use the right amount of light for the task, not overkill. "More light"

is not the approach to use. When not blinded by glare, the eye is a marvelous instrument and can see very well at what seems to be quite low lighting levels. In addition, going from over lit areas to darker areas means that we don't see too well (transient adaptation), and the opposite holds as well.

"It All Works. Such quality lighting design has been used for some time now in many locations. Such cities are benefiting by better lighting for their citizens, by a great deal of energy savings, and by darker skies (but not darker streets). We all really do win."
For more info "<http://www.darksky.org/ida/key/intro.html>"

* 199 - SKY GLARE REDUCTION FROM TREES.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Sky Glare Reduction from Trees.

Trees filtering sunlight does more than just cooling with shade, they reduce the glare of bright skies. This makes it easier on the eyes to look up and enjoy the scenery - especially in urban areas with little vegetation.

* 200 - VISUAL AESTHETIC LOSS FROM SLAB BRIDGE RAILINGS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Visual Aesthetic loss from Slab Bridge Railings.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Replacing See-Through Bridge Railings with concrete slab rails loses the few peeks a passenger has of the countryside.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Visual Aesthetic loss from Slab Bridge Railings.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 201 - LOSS OF THE THRILL OF SEEING A WILD ANIMAL IN ITS NATURAL HABITAT.**

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Loss of the Thrill of Seeing a Wild Animal in its Natural Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Loss of the Thrill of Seeing a Wild Animal in its Natural Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 202 - PLANTING TREES FOR AESTHETIC VISUAL BEAUTY.**

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully
why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Planting Trees for Aesthetic Visual Beauty.

*** 203 - LOSS OF COOLING SHADE FROM TREES.**

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Loss of Cooling Shade from Trees.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Trees cool large amounts of surface level air and land (especially black asphalt) by providing shade and by evaporation. In sunny areas workers often prefer tree shaded parking spaces.

Please these criteria to measure this impact: temperature, volume of air cooled, mapped area of impact, duration of impacts.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Loss of Cooling Shade from Trees.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal

laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 204 - PLANTING TREES FOR OUTDOOR COOLING SHADE.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Planting Trees for Outdoor Cooling Shade.

Trees cool large amounts of surface level air and land (especially black asphalt) by providing shade and by evaporation. In sunny areas workers often prefer tree shaded parking spaces.

-

* 205 - INTELLECTUAL INSULT OF MAN-MADE DEVELOPMENT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Intellectual Insult of Man-made Development.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The Intellectual Insult of non-natural man-made development or extraction activities in a Wild Area is real. Some people value wilderness and other phenomena as priceless.

How much money must I offer so you will sell your child or your mother? Consider the outrage if someone offered money to avoid democracy, justice or religion.

"Large aspects of human values are strictly emotional. They can scarcely be measured in material terms, nor can a monetary value be assigned to them. Even money, itself, often acquires an emotional value that may not be very closely related to its intrinsic value."

"Such value judgments may not be lightly dismissed as is shown by the fact that most of the values for which men will face death - such as love, patriotism, or honor - or for which they will face economic loss - such as friendship, dignity, sentiment, or, above all, beauty - cannot be measured in money." Encyclopedia of Biological Sciences, P. Gray, McGraw-Hill 1961, p 271

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Intellectual Insult of Man-made Development.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 206 - AIR POLLUTION GENERAL.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution General.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Sins of Emission

"U.S. Industries pump at least 2.4 Billion pounds of chemicals into the air every year." Audubon 1994 Environmental Almanac citing US-EPA

Air Pollution has been measured traveling at least 7,000 miles from Manchuria, China to Crater Lake, Oregon and caused significant degradation of air quality at that distance. Science News, Dec 12, 1998

School Absenteeism Rises When Air Pollution Rises
-Effects of ambient air pollution on School Absenteeism Due to Respiratory Illnesses, Report sponsored in part by US-APE & CARB.
www.epidemiology.com

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution General.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 207 - INDOOR AIR POLLUTION.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Indoor Air Pollution.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Indoor Air Pollution includes lead, radon, secondhand tobacco smoke, cleaning chemicals (e.g. ammonia and chlorine), pesticides, ozone from photocopiers and laser printers, photography chemicals, hobby chemicals, insulation outgassing, building material outgassing; furniture, drapes and rug outgassing; heating appliances (exhaust from space heating, water heating and cooking appliances. Wood stoves, kerosene heaters, coal heaters and natural gas water and space heaters are of special concern).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Indoor Air Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
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31. Please quantify all potential CUMULATIVE impacts related to this one.
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33. Please list, describe and quantify all Construction impacts related to this one.
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35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
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46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
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- * 208 - VAPOR INTRUSION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Vapor Intrusion.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Vapor Intrusion occurs when volatile compounds, typically liquids such as TCE (trichloroethylene and chlorinated hydrocarbons, ascend through soil and building foundations and create indoor air pollution.

In Denver, chlorinated organic solvents from dry-cleaning and degreasing operations are cancer causing and a common example of this problem.
Scientific American July 2002

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Vapor Intrusion.

1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
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- 20b. If no margin of error is used please state that clearly.
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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 209 - VEHICLE AIR POLLUTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Vehicle Air Pollution.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Vehicle Air Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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12. Please state the most extreme values which could be encountered.

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15. Please provide a graph of HISTORICAL measurements.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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46. Please provide the reverse of this impact as Mitigation.

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* 210 - AIR POLLUTION-NITROGEN OXIDES (NOX) BY CONCENTRATION.

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of Air Pollution-Nitrogen Oxides (NOx) by Concentration.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The concentration of an air pollutant is independent of its weight and more important to safe breathing. No one has ever drowned by being surrounded by a cloud (which can have a mass of millions of pounds), but people often drown in just a few inches or ounces of water (concentrated cloud).

"It has been shown that prolonged exposure to NOx, greater than 0.5 ppm appears to be particularly hazardous for person with asthma, chronic respiratory diseases, and cardiac disease. People living in the Los Angeles area are often exposed for long periods of time to NOx concentrations above what is considered safe." Dictionary of Scientific Literacy, Brennan, 1992, Wiley.

A report done in 1990 for the US-EPA by Tom Addison found:
"Analyzing the effects of only one pollutant often was justified by the inaccurate conclusion that CO serves as an 'indication of the full range of pollutants'. The effects of a project on the full range of

pollutants, however, can NOT be estimated by CO emissions. In general, increasing the average travel speed on a freeway from a congested, stop-and-go condition to a steady flow decreases the emissions of both CO and total HC (hydrocarbons), but INCREASES the emissions of NO (oxides of nitrogen). Furthermore, the impacts of CO are localized, but the formation of ozone from HC and NO affects the larger air basin".

"Nitrogen Dioxide's odor threshold is between 1 and 3 ppm; nose and throat irritation has been associated with 13 ppm. At concentrations of 25 ppm volunteers complained of pulmonary discomfort after five minutes of exposure."

What are the significance levels used for breathing concentrations versus time for NOx (as distinguished from weight)?

Labware Direct (1 800 356 0783) sells Nitrogen Dioxide detection system measuring concentrations as as low as 0.5 ppm.

Davis Instruments sells a Nitrogen Dioxide monitor for \$517 which measures down to 0.1 ppm. (800 269 0299)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Nitrogen Oxides (NOx) by Concentration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 211 - AIR POLLUTION-NITROGEN OXIDES (NOX) BY WEIGHT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Nitrogen Oxides (NOx) by Weight.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The San Luis Obispo Air Pollution Control District states that any activity creating 10 lbs of Nitrogen Oxides (NOx) or more per day is a potentially significant impact; and any activity creating more than 137 lbs / day of NOx requires an EIR in all cases.

MBAPCD Significance Level for Nitrogen Oxides (NOx) is the same at 137 lbs / day.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Nitrogen Oxides (NOx) by Weight.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 212 - AIR POLLUTION-SULFUR DIOXIDE (SO₂) BY CONCENTRATION.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Sulfur Dioxide (SO₂) by Concentration.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The concentration of an air pollutant is independent of its weight and more important to safe breathing.
No one has ever drowned by being surrounded by a cloud (which can have a mass of millions of pounds), but people often drown in just a few inches or ounces of water (concentrated cloud).

Increased mortality from bronchitis and lung cancer has been observed with an annual mean Sulfur dioxide concentration of 0.04 part per million. (Environmental Protection, Emil Chanlett 1979)
The London Smog of Dec 1952 killed some 4000 people at a measured SO₂ concentration of 1.34 ppm. "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 45

Many air pollution disasters have involved SO₂: London 1952 (4000 human deaths); London 1956 (1000 dead); London 1957 (700-800 dead); London 1962 (700 dead); London 1880 (1000 dead); New York 1953 (250 dead); New York 1963 (200-400 dead); Meuse Valley Belgium 1930 (63 dead); Donora Pennsylvania 1948 (20 dead).

"In contact with water it is converted into sulfurous acid (H₂SO₃) and ultimately sulfuric acid (H₂SO₄). This acid corrodes machinery and metal components and damages stone buildings (and marble statues), the Acropolis being a good example. Even more seriously it engenders respiratory and lung diseases in millions of people. For many years people refused to accept that this problem extended beyond industrial centers themselves. But acids can be carried great distances on the wind, ... from USA to Canada, before falling as acid rain. Forest growth is disrupted and the debilitated trees become prone to disease and parasitic attack. Today the forests of central Europe

are beginning to die as the alkaline reserves in the bedrock become exhausted. In lakes and waterways all life ceases when the pH value falls below about 4. Many lakes in Scandinavia are already devoid of all organic life." Earth Book Atlas 1987, pg 24 ISBN 0-87746-100-7

"Sulfur dioxide in the air at concentrations of 1 part per million can kill the cells in leaves." Yearbook of Agriculture 1957

The states of Virginia and Maryland set maximum concentration levels for one (1) hour at 0.1 ppm for Sulfur oxides.

The state of Hawaii set maximum concentration levels for annual exposure to Sulfur oxides at 0.007 ppm.

What are the significance levels used for breathing concentrations versus time for SO₂?

Labware Direct (1 800 356 0783) sells Sulfur Dioxide detection system measuring concentrations as as low as 0.05 ppm.

Davis Instruments sells a Sulphur Dioxide monitor for \$517 which measures down to 0.1 ppm. (800 269 0299)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Sulfur Dioxide (SO₂) by Concentration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

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18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 213 - AIR POLLUTION-SULFUR DIOXIDE (SO₂) BY WEIGHT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Air Pollution-Sulfur Dioxide (SO₂) by Weight.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Increased mortality from bronchitis and lung cancer has been observed with an annual mean Sulfur dioxide concentration of 0.04 part per million. (Environmental Protection, Emil Chanlett 1979) The London Smog of Dec 1952 killed some 4000 people at a measured SO₂ concentration of 1.34 ppm. "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 45

Many air pollution disasters have involved SO₂: London 1952 (4000 human

deaths); London 1956 (1000 dead); London 1957 (700-800 dead); London 1962 (700 dead); London 1880 (1000 dead); New York 1953 (250 dead); New York 1963 (200-400 dead); Meuse Valley Belgium 1930 (63 dead); Donora Pennsylvania 1948 (20 dead).

"In contact with water it is converted into sulfurous acid (H₂SO₃) and ultimately sulfuric acid (H₂SO₄). This acid corrodes machinery and metal components and damages stone buildings (and marble statues), the Acropolis being a good example. Even more seriously it engenders respiratory and lung diseases in millions of people. For many years people refused to accept that this problem extended beyond industrial centers themselves. But acids can be carried great distances on the wind, ... from USA to Canada, before falling as acid rain. Forest growth is disrupted and the debilitated trees become prone to disease and parasitic attack. Today the forests of central Europe are beginning to die as the alkaline reserves in the bedrock become exhausted. In lakes and waterways all life ceases when the pH value falls below about 4. Many lakes in Scandanavia are already devoid of all organic life." Earth Book Atlas 1987, pg 24 ISBN 0-87746-100-7

The San Luis Obispo Air Pollution Control District states that any activity creating 10 lbs of Sulfur Dioxide or more per day is a potentially significant impact; and any activity creating more than 137 lbs / day of SO₂ requires an EIR in all cases.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Sulfur Dioxide (SO₂) by Weight.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 214 - AIR POLLUTION-SULFUR DIOXIDE (SO₂) COMBINED WITH PARTICULATES.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of

Air Pollution-Sulfur Dioxide (SO₂) Combined with Particulates.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Combinations of two or more gas-aerosol mixtures in moist and cold weather can caused synergistic (highly enhanced) damage to health."

This refers to a discussion of air pollution disasters including the loss of 400 lives in London in Dec 1952.

"Animal test suggest that when particulate matter and SO₂ concentrations, normally considered to be harmless, existed together as a gas-aerosol combinations, they produced purple hemorrhage and paralysis of respiratory tracts. If, additionally, these gas-aerosol mixtures occurred in a super cool state such as was the case in the 1952 [London] fog, they showed on reaching the lungs, a higher toxicity than hydrocyanic acid(HCN)." "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 50

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Sulfur Dioxide (SO₂) Combined with Particulates.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 215 - AIR POLLUTION-SULFATE (SO4).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Sulfate (SO4).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

In the Northeast US SO4 comprises about 60% of the pm 2.5.
PM 2.5 typically remains in the air for 5 days.
In the West, there is more dust and sulfate is less (but still) important.

There is a CAA standard for SO2 but not SO4 (sulfate).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Sulfate (SO4).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 216 - ACID PRECIPITATION "ACID RAIN".

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Acid Precipitation "Acid Rain".

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

ANY INCREASE FROM FULL USE IS A SIGNIFICANT ENVIRONMENTAL IMPACT

When a resource is fully used, or at capacity, any increase in demand is a potentially significant environmental impact under California's Environmental Quality Act (CEQA). It is also a potentially significant cumulative environmental impact.

"Once the 'cumulative loading' of acids deposited in these areas through the years has exhausted the environment's limited neutralizing capacity, severe effects follow very quickly with the addition of small, previously inconsequential quantities of acid." G. Whetstone, Environmental Law Reporter, 10, 1982

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Acid Precipitation "Acid Rain".

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 217 - ACID RAIN HARMING FORESTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Acid Rain Harming Forests.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Acid rain includes all forms of precipitation - rain, snow and fog.
It is caused in large part by coal-fired electric plants.

"Highly acidic rain, pH 3.0 and lower, does damage some crops. Acid rain also damages trees." -Dictionary of Scientific Literacy, Wiley, 1992

"Rainwater is normally slightly acidic... however Adinondack lakes were at least one hundred times more acidic than expected." Adinondack Mountains are downwind of some major coal-fired power plants.
Environmental Science, M,M & W p 9

"Death rates in trees in midwestern US forests showed a dramatic rise during the 1980s. This and similar problems in European forests, appears to be due to interactions of air pollution effects (acid rain and excess deposition of nitrogen are altering soil chemistry and water quality, and high ozone concentrations at ground level are damaging foliage) with natural stresses, such as insect attacks, diseases, and drought." Betrayal of SR, p 151

Leaching of the critical nutrient calcium from forest soils in the eastern US is occurring at an unsustainable rate. Long-Term Depletion of Calcium and other nutrients in Eastern US Forests, Environmental Management, Federer, et al 13:593-601

That loss, which appears to be caused by a combination of short-rotation harvesting of the forests and acid precipitation, could result in a roughly 50 percent drop in both calcium and forest biomass in about 120 years. "The effects of leaching and whole-tree harvesting on cation budgets of several forests", Johnsen et al, Journal of Environmental Quality 17: 418-424

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Acid Rain Harming Forests.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 218 - LIMING LAKES.

Adding lime to lakes is sometimes suggested as a way to reduce the impacts of acid rain.

"Let us dismiss out of hand that we can lime the northeast quadrant of a continent... If you take an acid lake and lime it, you do not now have anormal lake; you now have a limed, formerly very acid lake, with a very peculiar water chemistry and a very peculiar biota as a result." Harold Harvery, on the use of lime to counteract the effects of acid rain, Adirondack Life, Sept-Oct 1982

"I would suggest it is a good way to manage a fish hatchery but a lousy way to manage an environment." Hans Martin, Director Air Resources Branch, Environment Canada, on the use of lime in lakes to counteract acid rain, speech, SOil Conservtion Society of America conference, Burlington, Vt., 25 Oct, 1982

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Liming Lakes.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Liming Lakes.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Liming Lakes.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Liming Lakes.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:

Liming Lakes.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Liming Lakes.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines

listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 219 - SCRUBBERS FOR VEHICLE SO2 EMISSIONS.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Scrubbers for Vehicle SO2 Emissions.

Scrubbers use a slurry of water and ground limestone to combine with the sulfur.

"Up to 90 percent of sulfur dioxide in flue gases can be removed with this technology."
There is no reason to expect this could not provide significant reductions in vehicle emissions.

* 220 - AIR POLLUTION-CARBON MONOXIDE (CO) BY CONCENTRATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Air Pollution-Carbon Monoxide (CO) by Concentration.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The concentration of an air pollutant is independent of its weight and more important to safe breathing.

No one has ever drowned by being surrounded by a cloud (which can have a mass of millions of pounds), but people often drown in just a few inches or ounces of water (concentrated cloud).

Carbon Monoxide from auto exhausts is a popular method of suicide.

"The usual levels of 30 ppm CO found in city air bind about 5 percent of the hemoglobin, which in terms of oxygen supply of the blood is comparable to living at an altitude of 6,000 feet."
"Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 56

Adverse Human Health Guidelines
"12-17 mg/cubic meter for 8 hours produces a concentration of 2-2.5% carboxyhemoglobin. 35 mg/cubic meter for 8 hours produces a concentration of 5% carboxyhemoglobin." Id.

There is no lower limit to measuring CO concentrations.

What are the significance levels used for breathing concentrations versus time for CO?

Labware Direct (800 356 0783) sells Carbon Monoxide detection system measuring concentrations as as low as 5 ppm.

Davis Instruments sells several CO monitors from \$265 to \$299 which measure down to 0.0 ppm. (800 269 0299)

KiddeSafety sells a continuous readout CO detector for \$40.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Carbon Monoxide (CO) by Concentration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 221 - AIR POLLUTION-CARBON MONOXIDE (CO) BY WEIGHT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Carbon Monoxide (CO) by Weight.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Carbon Monoxide from auto exhausts is a popular choice for suicide as it is so lethal.

"Of the world's total CO production of 232 million tons, 80 percent is produced by automobiles." "Atmospheric Pollution", Wilfrid Bach,

McGraw-Hill 1972 p 56

"The usual levels of 30 ppm CO found in city air bind about 5 percent of the hemoglobin, which in terms of oxygen supply of the blood is comparable to living at an altitude of 6,000 feet." Ibid, p 56

"CO is a very stable gas. In an experiment a CO-O mixture under exposure to sunlight remained unchanged even after seven years." Ibid, p 10

There is no lower limit to detecting CO concentrations when using nondispersive infrared spectrometry. Ibid p 138

The San Luis Obispo Air Pollution Control District states that any activity creating more than 50 lbs / day of Carbon Monoxide is a potentially significant impact; and any activity creating more than 550 lbs / day of Carbon Monoxide requires an EIR in all cases.

The MBAPCD Significance Level for Carbon Monoxide (CO) is 550 lbs / day.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Carbon Monoxide (CO) by Weight.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 222 - AIR POLLUTION-CARBON DIOXIDE (CO2).

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Carbon Dioxide (CO2).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"CO2, released into the air remains there for at least several centuries." "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972
citing C.D. Keeling, "The Concentration and Isotopic Abundances of CO2
in the Atmosphere," Tellus 12, 200-203, 1960

What thresholds do you use as significant in both weight and concentration?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Carbon Dioxide (CO2).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 223 - AIR POLLUTION-HYDROCARBONS (HC).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Hydrocarbons (HC).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Common sources of HC air pollution are Vehicles, Burning and decomposition. Vehicle HC air pollution turns into SMOG. Oil from paving releases continuous long term HC air pollution. (See also Asphalt-Water Pollution)

A concentration of HC at 100 micrograms / cubic meter can produce injury. Email Chanlett, Environmental Protection, 1979, citing NAAQS 1971

A concentration of HC of 160 micrograms / cubic meter is the maximum level that may occur 6-9 am once each year. Id.

Labware Direct (1 800 356 0783) sells Diesel exhaust detection system measuring concentrations of "High Class" hydrocarbons as low as 100 ppm; "Low Class" hydrocarbons as low as 0.05%; and petroleum distillates as low as 0.5 mg/Liter.

Davis Instruments sells a combustible gas detector for ammonia, methane, natural gas, propane, butane, isobutane, cyclopentane, ethane, ethanol, CO monitors for \$230 which measures down to 5 ppm. (800 269 0299)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Hydrocarbons (HC).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 224 - AIR POLLUTION-REACTIVE ORGANIC GASES (ROGS OR VOCs) BY CONCENTRATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Reactive Organic Gases (ROGs or VOCs) by Concentration.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The concentration of an air pollutant is independent of its weight and more important to safe breathing.
No one has ever drowned by being surrounded by a cloud (which can have a mass of millions of pounds), but people often drown in just a few inches or ounces of water (concentrated cloud).

Reactive Organic Gases (ROGs) include: unsaturated olefins and compounds belonging to the aromatic or benzene group.

"The aromatics have been found to be carcinogenic or cancer-producing."
"Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 10

Pesticides used in California fields can cause smog in agricultural regions of the state, according to a report released recently by the Environmental Working Group and Californians for Pesticide Reform. After application, pesticides give off large quantities of reactive organic gases (ROGs), also known as volatile organic compounds (VOCs), which contribute to formation of smog and which can also cause cancer, birth defects, nerve damage and kidney and heart disease. Approximately 98.9 million pounds of ROGs are emitted from pesticides each year in California -- nearly four times the total ROG emissions from petroleum refining, and more than double the ROG emissions from all other industrial sources.

ROGs (or VOCs) are often measured in units of pounds per square inch Reid Vapor pressure.

Gasoline containing ethanol is limited to 0.2 psi (Reid).

What are the significance levels used for breathing concentrations versus time for ROGs?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Reactive Organic Gases (ROGs or VOCs) by Concentration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 225 - AIR POLLUTION-REACTIVE ORGANIC GASES (ROGS OR VOCs) BY WEIGHT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Air Pollution-Reactive Organic Gases (ROGs or VOCs) by Weight.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Pesticides used in California fields can cause smog in agricultural regions of the state, according to a report released recently by the Environmental Working Group and Californians for Pesticide Reform. After application, pesticides give off large quantities of reactive organic gases (ROGs), also known as volatile organic compounds) which contribute to formation of smog and which can also cause cancer, birth defects, nerve damage and kidney and heart disease. Approximately 98.9 million pounds of ROGs are emitted from pesticides each year in California -- nearly four times the total ROG emissions from petroleum refining, and more than double the ROG emissions from all other industrial sources.

The San Luis Obispo Air Pollution Control District states that any activity creating 10 lbs of Reactive Organic Gases (ROGs) or more per day is a potentially significant impact; and any activity creating more than 137 lbs / day of ROGs requires an EIR in all cases.

ROGs (or VOCs) are often measured in units of pounds per square inch Reid Vapor pressure.

The MBAPCD CEQA Significance Level for Reactive Organic Gases (ROGs) is 137 lbs / day.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Reactive Organic Gases (ROGs or VOCs) by Weight.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 226 - AIR POLLUTION-RADON-222.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Air Pollution-Radon-222.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Radon is the decay product of Radium 226. Radon-222 is the decay product of uranium 238. Radon decays into radioactive elements which emit alpha particles, which in a respiratory system can lead to lung cancer.

Radon-222 quickly decays into solid particles that when inhaled expose lung tissue to a large amount of ionizing radiation.

Ionizing radiation damages biological damage because it has enough energy to knock an electron out of its orbit. A powerful blast of radiation can cause cancer by damaging a cell's repair mechanism.

The EPA's indoor radon survey suggests that annual radon levels above 4 picocuries (4 trillion's of a curie) is unsafe. Canada, Sweden and Norway have set 20 picocuries as the maximum safe level. Living in The Environment by G. Tyler Miller pg 477, Wadsworth Publishing 1998

A California state report released April 22 1999 concluded about five (5) percent of California's elementary schools have significant concentrations of cancer-causing radon. It sampled 378 of the state's 5400 elementary schools.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Radon-222.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 227 - AIR POLLUTION-FORMALDEHYDE.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Formaldehyde.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Formaldehyde is a respiratory irritant and a known carcinogen on the California Proposition 65 list.

CARB's recommended exposure limit is 0.5 parts per million.

Battelle Memorial Institute in Columbus Ohio, measured 24-hour Formaldehyde emissions from 55 domestic consumer and construction products. Many consumer product release copious amounts including

Latex paints, insulating foams, acid-cured floor finishes (up to 1.2 grams per square meter per hour), particleboard, and pre-pasted wall-paper (nearly 700 micrograms per square meter per hour). Science News Jan 9 1999, pg 22

Labware Direct (1 800 356 0783) sells Formaldehyde detection systems measuring concentrations as low as 1 ppm.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Formaldehyde.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 228 - AIR POLLUTION-LEAD (PB).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Air Pollution-Lead (Pb).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

According to the Agency for Toxic Substances and Disease Registry neurological studies do not indicate any safe level of lead exposure.

Lead is a known carcinogen on the California Proposition 65 list.

Lead is a known reproductive toxic on the California Proposition 65 list.

Lead is a known male reproductive toxic on the California Proposition 65 list.

Lead Air Pollution has been measured traveling at least 7,000 miles from Manchuria, China to Crater Lake, Oregon exceeding 10 times its typical values. Science News, Dec 12, 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Lead (Pb).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,

credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 229 - AIR POLLUTION-ARSENIC.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Arsenic.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Arsenic Air Pollution has been measured traveling at least 7,000 miles from Manchuria, China to Crater Lake, Oregon exceeding 10 times its typical values. Science News, Dec 12, 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Arsenic.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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47. Please provide an ALTERNATIVE which avoids this impact.

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* 230 - AIR POLLUTION-MERCURY (HG).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Mercury (Hg).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Mercury is known to the state of California as causing reproductive toxicity on the California Proposition 65 list.

US-EPA reported some 341 tons of mercury are spewed into the air annually, mostly by power plants and incinerators. Science News Vol 145: 119
"Even lightbulbs, paint and dental fillings contribute substantially."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Mercury (Hg).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows

whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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* 231 - AIR POLLUTION-CADMIUM (CD).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Air Pollution-Cadmium (Cd).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Human activity has ... multiplied the natural flow of cadmium into the atmosphere eightfold..." Beytrayal or Science and Reason, Erlich, 1996

Cadmium is a known carcinogen on the California Proposition 65 list.
Cadmium is a known reproductive toxic on the California Proposition 65 list.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Cadmium (Cd).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 232 - AIR POLLUTION-CHROMIUM.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of

Air Pollution-Chromium.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Chromium is a known carcinogen that causes tumors of lungs and nasal passages when inhaled.

"Chromium, in its 'hexavalent' state, is one of the most potent substances proven to cause cancer in humans." -L.A.'s Lethal Air, Eric Mann, 1991

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Chromium.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 233 - AIR POLLUTION-BERYLLIUM.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Beryllium.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Beryllium disease is an incurable lung illness.

Beryllium is a metal critical to the US Military. It is used in missiles
jet planes and weapons.
A federal safety limit exists.

Nearly 150 Dept of Energy and contractor employees exposed to radioactive substances have been diagnosed with Chronic Beryllium Disease.

DOE estimates between 250 and 700 DOE contractors will develop radiation induced cancers over the next 30 years, of which 60 percent may die.
(US-DOE Office of Env Health & Safety, 1999)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Beryllium.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 234 - AIR POLLUTION-COPPER.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Copper.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Copper Air Pollution has been measured traveling at least 7,000 miles

from Manchuria, China to Crater Lake, Oregon exceeding 10 times its typical values. Science News, Dec 12, 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Copper.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 235 - AIR POLLUTION-OZONE FROM VEHICLES (O3) CONCENTRATIONS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Air Pollution-Ozone from Vehicles (O3) Concentrations.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Ozone induces nausea, headaches and lung infections at 0.5 parts per million. Ozone is lethal at 50 ppm after 30 minutes. The current U.S. Ozone limit is 0.08 ppm averaged over eight hours and 0.12 ppm for one hour. At 0.07 ppm of ozone "even robust individuals may suffer temporary, subtle damage - leaky lungs." Science News May 13, 2000

This means that lung damage can occur when ozone levels are below U.S. legal limits.

"Each year, smog prematurely kills more than 1,600 people in the South Coast basin (Los Angeles), according to air quality officials" -L.A.'s Lethal Air, Eric Mann, 1991

The Pinnacles monitoring station in Monterey County recorded numerous violations of the state ozone standard from 1992-1997.

According to Ellis B. Cowlings of North Carolina State University US crop yields are reduced by \$5 billion to \$10 billion annually by ozone pollution. Science News March 27, 1999

Labware Direct (1 800 356 0783) sells Ozone detection system measuring concentrations as low as 0.025 ppm.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Ozone from Vehicles (O3) Concentrations.

- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
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16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
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- 20b. If no margin of error is used please state that clearly.
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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 236 - AIR POLLUTION-SMOG FROM VEHICLE CONCENTRATIONS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-SMOG from Vehicle Concentrations.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- SMOG is caused by pollutants including ground level ozone, vehicle HC
and can be caused by pesticides used in California fields.
- "Each year, smog prematurely kills more than 1,600 people in the South Coast basin (Los Angeles), according to air quality officials" -L.A.'s Lethal Air, Eric Mann, 1991
- The Pinnacles monitoring station in Monterey County recorded numerous violations of the state ozone standard from 1992-1997.
- Labware Direct (1 800 356 0783) sells Ozone detection system measuring concentrations as low as 0.025 ppm.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-SMOG from Vehicle Concentrations.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
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* 237 - AIR POLLUTION-OZONE ON AGRICULTURAL PRODUCTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-OZONE on Agricultural Production.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

The California Air Resources Board Crop Loss Air Pollutant Assessment
Program report has provided information to guide efforts to design

crop-effects studies, to perform economic analyses of yield loss, and to
prepare reports for other local, State, and Federal agencies on the
effects of air pollution on the public welfare. It found -

"In 1993, ozone-caused yield losses of 20-30% were estimated for cantaloupes, grapes, and cotton, which are known to be ozone-sensitive crops. Moderate losses (10-15%) were projected for dry beans, oranges, alfalfa, onions, and lemons. Minor losses (1-7%) were expected for ozone-tolerant crops such as tomato, wheat, rice, corn, and lettuce. GIS-based techniques were used to refine county-averaged estimates of yield loss in selected agricultural production areas. By plotting effects to acreages of irrigated farmlands only, differences in crop loss within a county could be accurately displayed. For example, cotton yield losses were 5-10% greater in the eastern portions of Fresno, Kings, and Tulare counties than in the western portions."

California Air Resources Board Research Notes: # 89-6 Crop Losses from
Air Pollution in California California Air Resources Board found -

"This research assessed the statewide effect of ambient ozone on the yield of important agricultural crops. Ozone dose-yield loss equations, ozone monitoring data, and county crop production data were used to estimate yield losses for each county and for the state as a whole. The study concludes that at current air quality levels, a number of important crops are suffering substantial yield losses. Based on these conclusions, an economic modeling study estimated that improving air quality could result in economic benefits of up to \$333 million to California growers and consumers."

The results of the Program in Crop Loss Assessment indicate that:

- 1) Ambient ozone is causing substantial yield losses in important California crops;
- 2) Substantial reductions in these losses could be realized by attainment of the State ambient air quality standard for ozone; and
- 3) Attaining the State standard for ozone may not be adequate to protect crops.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-OZONE on Agricultural Production.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 238 - AIR POLLUTION-RADIOACTIVE MATTER.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Radioactive Matter.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

There are two major types of radioactive air pollution - constant
low level and intermittent high level.
A low level (relatively) continuous example is the radioactivity released from burning wood in woodstoves.

"Radioactivity is neither spatially or temporally uniform, natural
radioactivity is neither physiologically nor biologically safe, any
amount of increased radiation, no matter how small, will increase the
number of persons affected by genetic disease."
A.M.O.Veale, "Biological
Effects of Fallout," New Zealand Science Review, 24(4), 49-50, 1966
cited by "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 86

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Radioactive Matter.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
- 30 Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 239 - AIR POLLUTION-RADIOACTIVE "SPILLS".
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Radioactive "Spills".
- If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.
- There are two major types of radioactive air pollution - constant low level and less frequent high level "spills."
Three-Mile Island released 10 million curies of radioactivity into the atmosphere at about 4am on March 28 1979. (Union of Concerned Scientists, Nucleus, Summer 1999
- "Reactor accidents are extremely serious." "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 91
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Radioactive "Spills".
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 240 - AIR POLLUTION-PESTICIDES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Pesticides.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

AMBIENT AIR PESTICIDES
"FRESNO, California, February 20, 2001 (ENS) -
Independent scientific
monitoring by the Environmental Working Group (EWG) has
found high
concentrations of a partially banned pesticide in the air some
California residents breathe."

"One-third of ambient air monitoring samples from the San
Joaquin Valley
detected the pesticide chlorpyrifos, which the federal
government has
banned for home use as unsafe for children. Chlorpyrifos
remains the
most widely used agricultural insecticide in California." Ibid

"Monterey County ranks third in California for the number of
pesticide
poisonings in a year" according to the California Department
of
Pesticide Regulation in Sacramento in 1997.

Some 428 cases of pesticide poisoning were reported to
public officials
in Monterey County during a six year period. 50 cases of
pesticide
poisoning were reported in Monterey County in 1996.

Monterey county uses at least 10 million pounds of
pesticides every year.
(10 million pounds only includes the disclosed active
ingredients.)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the
objective
(non-subjective) CRITERIA used to determine the impact
significance of
Air Pollution-Pesticides.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe
how the threshold of significance chosen is scientifically
testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS
(numbers) used to determine the significance for EACH
criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to
determine the significance for each criteria.

5b. If no method of measurement was used please state that
clearly for each criteria and explain thoroughly how the data
was obtained.

6. Please quantify the existing or current BASELINE
measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level
and whether the MARGIN of ERROR is measured or
assumed.

8. Please state the VARIANCE or fluctuation, assumed or
expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or
confidence level.

10. Please state whether this MARGIN of ERROR is
measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be
encountered.

13. Please describe and quantify which criteria and
ASSUMPTIONS the Impact Significance predictions are
most SENSITIVE.

14. Please analyze and quantify how sensitive those
predictions are to reasonably foreseeable varying criteria and
assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time
period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the
impact changes from significant to less-than-significant and
the clear criteria and rationale for that
number.

19. Please provide the MARGIN of ERROR used (in percent
and absolute amount) for measuring the Significance
THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is
measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the
impact changes from LEGAL to ILLEGAL for ALL related and
potentially relevant local, state and federal
laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP
with increasing input, other impacts have complex non-linear
relationships. Please provide a graph that shows
whether the relationship is linear or otherwise - when at and
near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM
CHANGE, to which the IMPACT could raise or lower the
baseline number and its MARGIN of ERROR or confidence
levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 241 - PESTICIDE DRIFT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Pesticide Drift.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Pesticide drift is that portion of the applied pesticide spray cloud which affects any biota outside the target area. All pesticides "drift" from their point of application. This drift can contaminate air, soils and water hundreds, and even thousands, of miles from where it was applied.

Talk to anyone who has experienced drift, however, and a complex picture emerges: a poisoned person who spends years trying to regain health; a pet injured or infertile; contaminated homes or property that must be abandoned; loss of a year's livelihood when contaminated crops can't be sold.

DRIFT HOW FAR?

Pesticides have caused damage 50 miles from their application site, traceable detection has occurred at 7,000 miles.

Pesticide drift has caused crop damage 50 miles from its application.
"In central Washington, 2,4-D applied to wheat fields drifted 10 to 50 miles and damaged vineyards." Air Pollution Control Association Journal 28:1015-1020, Robinson, E. and L.L. Fox 1978

Lead, Copper and Arsenic Air Pollution has been traced and measured traveling at least 7,000 miles from Manchuria, China to Crater Lake, Oregon exceeding 10 times Crater Lake's typical values. Science News, Dec 12, 1998

Arctic Pesticide Air Pollution - Hundreds of miles away. Pesticides including endosulfan, dieldrin, chlordane, heptachlor and hexachlorocyclohexane have been found in the snow of the upper Northwest Territories hundreds, and more likely thousands, of miles from any potential beneficial application. Air samples from Ellsmere Island, the northernmost land in Canada contain all those plus DDT, chlorobenzenes and toxaphene. (Pandora's Poison)

"Chemical Spray may drift, even on a slight breeze, and can kill nearby plants and insects." (Invasive Exotic Plants in Monterey County, brochure by Monterey County Planning Dept #293-0274 4/98)

Monterey County's top goal for its Agricultural Commissioner's office in 2001 is education about minimizing pesticide spray drift. Monterey County 2001-2002 Budget p 282

HOW MUCH DRIFTS?

"Some 50 percent [of pesticides applied by aerial crop dusters] to 75 percent miss the target area." BSR p 164 citing - "Pesticide Drift IV:

On Target deposits from aerial application of insecticides." J. of Economic Entomology 63: 1982-1983; Reducing Pesticide Application Drift Losses, G. Ware U of Arizona College of Ag.; "The Use of Pesticides in the Cultivation of Cotton in Central America", UN Environmental Programme, 1985 July-September.

"According to the US Dept of Agriculture no more than 2% (and often less than 0.1%) of the insecticides applied to crops by aerial spraying or by ground spraying actually reaches the target pests; less than 5% of herbicides applied to crops reaches the target weeds."

"No more than 2% of all the insecticide sprayed on a field finds its target, but every spider gets insect meals-or it does not live to reproduce. A typical acre of meadow or woods contains an estimated 50,000 to 2 million spiders, each devouring hundreds of insects per year."

Because of the loss to "drift" aircraft apply about 30% more pesticide than ground application. (Miller, Living in The Environment, 1999 pg 624)

FRESNO, California, February 20, 2001 (ENS) - A National Cancer Institute researcher who matched pesticide data and medical records in 10 California agricultural counties reported last week that pregnant women living within nine miles of farms where pesticides are sprayed on fields may have an increased risk of losing an unborn baby to birth defects.

"The smaller the particle - the farther downwind it will travel before settling out." In one experiment 450 pounds (8.6 x 10¹⁵th particles) of two (2) micron particles (Human hair is about 100 microns) of Zinc Cadmium, which fluoresces under UV light, were released from a ship traveling ten miles offshore over a course of 156 miles. The resulting pollution was detected over a land area of 34,000 square miles. Encyclopedia of Biological Sciences, P. Gray, McGraw-Hill 1961

Spray Droplet Size Affects Drift Distance
Surfactants can have two effects on droplet surface tension. They can Increase or Decrease surface tension, but they can not do both.

Increasing surface tension makes larger drops which drift less and do not adhere to plants as well.

Decreasing surface tension makes smaller drops which drift more and absorb better to target plants.

Please specify the maximum drift goal and the droplet size.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pesticide Drift.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 242 - TOXIC DRIFT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Toxic Drift.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Toxic flouride gas emissions from an aluminum ore reduction plant killed a large stand of trees in Spokane, Washington in the aerly 1950's, and significant foliar damage was observed in an 80 square kilometer (50 square mile) area. Wiley's Encyclopedia, p 644

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Toxic Drift.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-
* 243 - AIR POLLUTION-AMMONIA.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Ammonia.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Inhalation of ammonia and ammonia vapors, commonly used in fertilizer,
can cause serious injury.

"An ammonia spill from the J.M. Smucker Co. plant in North County closed
four Pajaro roads and tied up traffic for about three hours Tuesday
night." Herald Dec 15 1999

"A dairy rancher in Sonoma County is to appear in court to face criminal charges of polluting a creek with 732,000 gallons of cow waste. The waste went into Washington Creek and then into the Petaluma River five miles away. The high volume of ammonia in the waste is extremely toxic to fish." Herald Dec 15 1999

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Ammonia.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

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46. Please provide the reverse of this impact as Mitigation.

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* 244 - NATIVE TREE PLANTING TO INCREASE AIR CLEANING BENEFITS.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Native Tree Planting to Increase Air Cleaning Benefits.

Trees directly reduce air pollution by removing airborne particulates from the atmosphere and helping to purify the air. California Code 4799.07. The Legislature finds and declares that:

(d) Trees directly reduce air pollution by removing airborne particulates from the atmosphere and helping to purify the air.

Coniferous trees are much more effective (80% reduction in some particulates measured) at filtering air pollution than deciduous trees.
"Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 117

Please analyze tree planting as mitigation for air pollution.

* 245 - AIR POLLUTION-TOXIC CHEMICALS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Toxic Chemicals.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Toxic Chemicals.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 246 - CHLORINE GAS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Chlorine Gas.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Chlorine at 1000 ppm is normally fatal even if only for a few moments.
A concentration of 3.5 ppm produces a detectable odor; 15 ppm causes immediate irritation of the throat. Concentrations of 50 ppm are dangerous for even short exposures; 1000 ppm may be fatal, even when exposure is brief. [Lewis, R.J. Sax's Dangerous Properties of Industrial Materials. 9th ed. Volumes 1-3. New York, NY: Van Nostrand Reinhold, 1996. 718]**PEER REVIEWED**

Acute toxic levels: The extent of injury depends on the concn and duration of exposure as well as the water content of the tissue involved and the presence of underlying cardiopulmonary disease. ... Estimated clinical effects ... as follows: ... 1-3 ppm: Mild mucous membrane irritation; ... 5-15 ppm: Moderate irritation of upper resp tract; 30 ppm: Immediate chest pain, vomiting, dyspnea, cough; 40-60 ppm: Toxic pneumonitis and pulmonary edema; 430 ppm: Lethal over 30 min; 1000 ppm: Fatal within a few min. [Ellenhorn, M.J. and D.G. Barceloux. Medical Toxicology - Diagnosis and Treatment of Human Poisoning. New York, NY: Elsevier Science Publishing Co., Inc. 1988. 878]**PEER REVIEWED**

Chlorine's odor threshold is 0.01 ppm

NIOSH sets a maximum air pollution threshold of 0.5 ppm for 15 mins maximum.

Davis Instruments sells a Chlorine monitor for \$517 which measures down to 0.1 ppm. (800 269 0299)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Chlorine Gas.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal

laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 247 - AIR POLLUTION-SWIMMING POOL CHLORINE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Swimming Pool Chlorine.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Swimming Pools (home, apartment or municipal) typically disinfect with
poisonous chlorine gas. That gas can be released by fires
when heat can
rupture the tanks holding the gas, or by other accidents.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Swimming Pool Chlorine.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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12. Please state the most extreme values which could be encountered.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 248 - HYDROGEN SULFIDE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Hydrogen Sulfide.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Davis Instruments sells a Hydrogen Sulfide monitor for \$375 which measures down to 1.0 ppm. (800 269 0299)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Hydrogen Sulfide.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 249 - DUST BLOWN FROM AREAS PERMANENTLY CLEARED OF VEGETATION.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Dust Blown from Areas Permanently Cleared of Vegetation.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"60,000 U.S. residents per year die from breathing particulates at or below legally allowed levels" - EPA, Joel Schwartz
The 60,000 figure is taken from "Air Pollution in Typical U.S. Cities Increases Death Risk," press release dated May 13, 1991, from the Harvard School of Public Health, Boston, Mass. describing findings later reported in Joel Schwartz and Douglas W. Dockery, "Increased Mortality in Philadelphia Associated With Daily Air Pollution Concentrations," AMERICAN REVIEW OF RESPIRATORY DISEASE Vol. 145 (1992), pgs. 600-604.
Two million deaths occur in the U.S. each year; according to Schwartz and Dockery, fine particles account for 3%.

Areas cleared of vegetation such as dirt parking lots, dirt roads and farms can cause substantial dust air pollution even in mildly windy times.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Dust Blown from Areas Permanently Cleared of Vegetation.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 250 - SMOKE.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Smoke.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Smoke can cause a number of significant environmental impacts including

human death, animal death, human health harm, animal health harm, home and building structure loss, structure damage, habitat loss, aircraft range limits, visual aesthetic loss (ugly skies and orange shadows), and repugnant smells.

Smoke can be made up of a wide range of toxic materials but it can be deadly all by itself. Smoke can be lethal even when there is no fire, just smoldering.

Smoke typically contains dense particulate air pollution.

When burning wild vegetation in California poison oak is often burned as well. Poison Oak in smoke is very harmful to lung and breathing airways.

According to the California state archivist smoke can contain damaging acids. article "Damages at Capitol could top \$8 million." AP Feb 10, 01

Smoke from fires colors shadows orange.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Smoke.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 251 - AIR POLLUTION-TOTAL SUSPENDED PARTICULATES BY CONCENTRATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Total Suspended Particulates by Concentration.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"PM10 is about 55 percent of the total TSP [total suspended particulates]; that is a TSP level of 100 micrograms/m³ is equal to a PM10 measurement of 55 micrograms/m³)." Economic Analysis of Environmental Impacts, 1996, Dixon et al, Earthscan Publishing

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Total Suspended Particulates by Concentration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 252 - AIR POLLUTION-PM10 PARTICULATES BY CONCENTRATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-PM10 Particulates by Concentration.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"PM10 is about 55 percent of the total TSP [total suspended particulates]; that is a TSP level of 100 micrograms/m³ is equal to a PM10 measurement of 55 micrograms/m³)." Economic Analysis of Environmental Impacts, 1996, Dixon et al, Earthscan Publishing

The concentration of an air pollutant is independent of its weight and more important to safe breathing.
No one has ever drowned by being surrounded by a cloud (which can have a mass of millions of pounds), but people often drown in just a few inches or ounces of water (concentrated cloud).

"60,000 U.S. residents per year die from breathing particulates at or below legally allowed levels" - written by Joel Schwartz EPA
The 60,000 figure is taken from "Air Pollution in Typical U.S. Cities Increases Death Risk," press release dated May 13, 1991, from the Harvard School of Public Health, Boston, Mass. describing findings later reported in Joel Schwartz and Douglas W. Dockery, "Increased Mortality in Philadelphia Associated With Daily Air Pollution Concentrations," AMERICAN REVIEW OF RESPIRATORY DISEASE Vol. 145 (1992), pgs. 600-604.
Two million deaths occur in the U.S. each year; according to Schwartz and Dockery, fine particles account for 3%. See also, Michael Weisskopf, "Particles in the Air Help Kill 60,000 a Year, Study Says," WASHINGTON POST May 13, 1991, pg. A13.

"The medical costs associated with the effects of [U.S.] particulate matter are estimated at nearly \$4 Billion each year."
-San Joaquin Valley Air Pollution Control Dist, Mar. 2000 newsletter.

What are the significance levels used for breathing concentrations versus time for PM10 Particulates?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-PM10 Particulates by Concentration.

- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
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31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
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34. Please list, describe and quantify all Growth impacts related to this one.
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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 253 - AIR POLLUTION-PM10 PARTICULATES BY WEIGHT.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-PM10 Particulates by Weight.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- "PM10 is about 55 percent of the total TSP [total suspended particulates]; that is a TSP level of 100 micrograms/m³ is equal to a PM10 measurement of 55 micrograms/m³." Economic Analysis of Environmental Impacts, 1996, Dixon et al, Earthscan Publishing
- "60,000 U.S. residents per year die from breathing particulates at or below legally allowed levels" - written by Joel Schwartz EPA
- "The medical costs associated with the effects of [U.S.] particulate matter are estimated at nearly \$4 Billion each year."
-San Joaquin Valley Air Pollution Control Dist, Mar. 2000 newsletter.
- According to the MBUAPCD, approximately 40 pounds of PM10 are emitted per acre per day of construction activity.
- The San Luis Obispo Air Pollution Control District states that any activity creating 10 lbs of PM10 or more per day is a potentially significant impact; and any activity creating more than 137 lbs / day of PM10 requires an EIR in all cases.
- MBAPCD Significance Level for PM10 Particulates is 82 lbs / day. Their threshold of significance is then just over two acres of construction per day.
- What are the significance levels used?
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-PM10 Particulates by Weight.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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33. Please list, describe and quantify all Construction impacts related to this one.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 254 - AIR POLLUTION-PARTICULATES SUBPM-10.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Air Pollution-Particulates SubPM-10.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Particulates below 5 micrometers are known as smoke and fume, those under 1 micrometer as aerosols. Particles smaller than 10 micrometers remain much longer as suspended matter in the air." Atmospheric Pollution, Wilfrid Bach, McGraw-Hill 1972 p 12

PM 2.5 means 2.5 micron particulates. (Human hair is about 100 microns)

"PM10 is about 55 percent of the total TSP [total suspended particulates]; that is a TSP level of 100 micrograms/m³ is equal to a PM10 measurement of 55 micrograms/m³." Economic Analysis of Environmental Impacts, 1996, Dixon et al, Earthscan Publishing
This means that the remainder, 45%, are particulates smaller than PM 10.

PM 2.5 typically remains in the air for 5 days.
"Very small particles in a size range of 1 to 4 microns in diameter are capable of passing the natural anatomical and physiological barriers of the upper respiratory tract (including the turbinates of the nose, the cilia of the trachea and the larger bronchi) and entering the alveolar bed of the lungs which are highly susceptible to infection." Encyclopedia of Biological Sciences, P. Gray, McGraw-Hill 1961

"The smaller the particle - the farther downwind it will travel before settling out." In one experiment 450 pounds (8.6 x 10¹⁵th particles) of two (2) micron particles of Zinc Cadmium, which fluoresces under UV light, were released from a ship traveling ten miles offshore over a course of 156 miles. The resulting pollution was detected over a land area of 34,000 square miles. Ibid

PARTICULATES: NEW STUDY INDICATES POSSIBLE HEALTH RISKS

"Tiny particles discharged into the air by cars can trigger fatal attacks of lung inflammation, blood clotting and heart attacks in vulnerable people," according to a new report published in the 1/21 issue of the British journal LANCET.

Studies of 14 different locations show that overall daily deaths, particularly from heart and lung disease, increase as the concentration of small particles in the air rises, the report says. Older people and smokers are most at risk. British scientists suggest that these particles, which are too small to settle or be dispersed by rain, "may

be the most important and dangerous aspect of pollution."

But corresponding studies in industrial centers do not show a similar increase in deaths, even in workers exposed to high concentrations of dust, scientists say. Particles from industrial pollution "tend to be larger and settle within hours." (London INDEPENDENT, 1/20).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Particulates SubPM-10.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 255 - AIR POLLUTION-PM10 SOOT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Air Pollution-PM10 Soot.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-PM10 Soot.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 256 - AIR POLLUTION-PM10 ASH.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-PM10 Ash.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-PM10 Ash.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 257 - DRYING BIOMASS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Drying Biomass.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The drying of lawn clippings released formaldehyde, methanol, acetyldehyde, acetone and other gases. The drying of millions of acres of cut alfalfa "could be quite a point source of [Volatile Organic Compound (Ozone precursor) pollution]." SciNews Apr 3, 99 citing Geophysical Research Letters, April 1, 99

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Drying Biomass.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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33. Please list, describe and quantify all Construction impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 258 - CHIMNEY SMOKE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Chimney Smoke.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Particulate pollution is blamed for more than 1,600 premature deaths in the San-Bernardino-Riverside area of California.
-L.A.'s Lethal Air, Eric Mann, 1991

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Chimney Smoke.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 259 - LIQUID NATURAL GAS FUEL.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Liquid Natural Gas Fuel.

The first permanent Liquified Natural Gas fueling station was dedicated near Coalinga, California Feb 2000. Vehicles (primarily commercial trucks) using this burn a mixture of 85 percent LNG and only 15 percent diesel fuel. This significantly reduces NOX and diesel particulates.
-San Joaquin Valley Air Pollution Control Dist, Mar. 2000 newsletter.

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* 260 - COMPRESSED NATURAL GAS FUEL.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of Compressed Natural Gas Fuel.

The first permanent Liquified Natural Gas fueling station was dedicated near Coalinga, California Feb 2000. Vehicles (primarily commercial trucks) using this burn a mixture of 85 percent LNG and only 15 percent diesel fuel. This significantly reduces NOX and diesel particulates.
-San Joaquin Valley Air Pollution Control Dist, Mar. 2000 newsletter.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

* 261 - AIR POLLUTION-DIESEL VEHICLE EXHAUST.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Air Pollution-Diesel Vehicle Exhaust.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Diesel engine exhaust is on California's Prop 65 List of Known Carcinogens.

"Diesel trucks and buses are two of the worst polluters and account for 27 percent of smog and soot produced by all of the nation's motor vehicles. This pollution threatens air quality of wildlife habitat in urban and suburban landscapes."
DENLines, Friday, Aug 11, 2000 (Defenders of Wildlife newsletter)

"Though they constitute only one in 50 vehicles on California's roads, diesel trucks and buses contributes 60 percent of the soot that comes from motor vehicles and 30 percent of the nitrogen oxides."
San Jose Mercury Editorial, May 2000

Diesel exhaust is a toxic soup that contains at least sixteen different carcinogens. Numerous studies on mice and rats have indicated that exposure through inhalation causes cancer. Furthermore, epidemiological studies on occupationally exposed workers have revealed a strong causal association between diesel exhaust exposure and lung cancer. The report estimates the range of cancer risks associated with diesel exhaust to be 22 to 4,400 potential excess cancers among every million persons. Many experts consider even one in a million to be a significant health threat.

1) AUTO INDUSTRY: DIESEL FUEL CARCINOGEN
FOUND MOST DEADLY

Japanese scientists suspect a chemical they detected in the emissions of diesel engines "may be the most carcinogenic ever found, and may be the cause of a rise in urban lung cancers." New Scientist magazine reported last week that the chemical 3- nitrobenzanthrone was found to cause more cellular mutations than the compound previously thought to be the most carcinogenic, 1,6 dinitropyrene. Researcher Hitomi Suzuki of Kyoto U. called for more stringent limits on diesel trucks (Baltimore Sun, 10/23).

2) NIOSH ISSUES CANCER ALERT FOR DIESEL
EXHAUST FUMES RACHEL'S
ENVIRONMENT & HEALTH WEEKLY #120 ---March 14,
1989---

The federal government has recently concluded officially that there is another good reason to be concerned about increased truck traffic in your neighborhood: five separate studies in the last 3 years have shown that diesel exhaust certainly causes cancer in laboratory animals, and two studies of railroad workers show that it causes cancer in humans as well. As a result of this determination, the National Institute for Occupational Safety and Health (NIOSH) has issued a special publication, CARCINOGENIC EFFECTS OF EXPOSURE TO DIESEL EXHAUST, offering this recommendation:

"As prudent public health policy, employers should assess the conditions under which workers may be exposed to diesel exhaust and reduce exposures to the lowest feasible limits." Citizens may reasonably ask: if NIOSH believes workers should not be exposed to diesel exhaust because of the cancer hazard, can health officials in other parts of government believe that the general public should continue to be exposed to diesel exhaust? Taken in this light, risk assessments that discuss only the traffic hazards associated with a facility are missing the major point: diesel trucks can evidently kill innocent people even if no traffic accidents occur."

Diesel engines use a less-refined (thus cheaper and more plentiful) fuel. When diesel fuel burns in an engine's combustion chamber, the resulting exhaust contains gases and particles (soot). The gases include nitric oxide, nitrogen dioxide, oxides of sulfur, and hydrocarbons (e.g., ethylene, formaldehyde, methane, benzene, phenol, 1,3 butadiene, acrolein, and polynuclear aromatic hydrocarbons [PAHs], several of which are known carcinogens). Of the particles in diesel exhaust, 95% are less than 1 micron in diameter and thus they are respirable, which is to say they are easily taken into the deepest portions of the human lung where they may lodge forever. The core of each particle is made up of pure carbon, but as many as

18,000 different chemicals from the gaseous portion of the exhaust may be adsorbed (attached) onto the carbon core, and thus diesel exhaust can carry a whole host of exotic, toxic and carcinogenic chemicals into the deepest portions of your lung-down in the region where the transfer of gas occurs to put oxygen into your blood stream and to take carbon dioxide out.

As recently as 1986, NIOSH concluded that diesel exhaust did not cause cancer in laboratory animals. However, in the period 1986-1988, five long-term animal studies, and two epidemiologic studies of humans, all concluded that exposure to diesel exhaust causes lung cancer. As a result, NIOSH reversed itself and in August, 1988, issued a special "current intelligence bulletin" to get the word out that diesel fumes are dangerous. NIOSH estimates that 1.35 million American workers are routinely exposed to diesel exhausts.

(1) CARCINOGENIC EFFECTS OF EXPOSURE TO
DIESEL EXHAUST [CURRENT
INTELLIGENCE BULLETIN 50; DHHS (NIOSH)
PUBLICATION NO. 88-116].
Cincinnati, OH: Division of Standards Development and
Technology
Transfer, NIOSH, Robert A. Taft Laboratories [4676
Columbia Parkway,
Cincinnati, OH 45226], August, 1988; phone (513) 5338287.
It's 30
pages and free.

July 18, 1997 Calif ARB Releases Report on Listing Diesel
Exhaust as a
Toxic Air Contaminant

After spending eight years evaluating the health effects of exposure to diesel exhaust, the California Air Resources Board (ARB) and California Office of Environmental Health Hazard Assessment (OEHHA) have released a report recommending the listing of diesel exhaust as a toxic air contaminant (TAC).

Under state law, the ARB is required to identify a substance as a TAC if the substance is "an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health." Due to both its carcinogenic potential and its non- carcinogenic respiratory effects, diesel exhaust clearly qualifies as a TAC.

Not only does diesel exhaust have carcinogenic health effects, but it also has noncancer pulmonary effects. Diesel exhaust is a major contributor to particulate pollution, which U.S. EPA estimates causes the premature death of 35,000 people each year. The wealth of evidence behind the EPA's new standard for fine particulates demonstrates the serious health consequences for everyone, but especially for sensitive

populations, such as children, the elderly, and those with heart and lung disease.

The ARB/OEHHA report may even underestimate risk. It does not take into account exposure to spikes in diesel exhaust, though we know that short-term exposures to high concentrations of particulate matter are dangerous. It also does not adequately address the increased risk to sensitive populations or combined effects of simultaneous exposure to diesel exhaust and other carcinogens.

The evidence is clear that diesel exhaust poses a hazard to human health. Since ARB and OEHHA have been evaluating diesel exhaust since 1989, listing as a TAC is now long overdue.

Labware Direct (1 800 356 0783) sells Diesel exhaust detection system measuring concentrations of "High Class" hydrocarbons as low as 100 ppm; "Low Class" hydrocarbons as low as 0.05%; and petroleum distillates as low as 0.5 mg/Liter.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Diesel Vehicle Exhaust.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 262 - AIR POLLUTION-DIESEL DELIVERY VEHICLE EXHAUST PARTICULATES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Diesel Delivery Vehicle Exhaust Particulates.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Delivery vehicles almost always use diesel engines.
Delivery vehicles almost always leave their engines running when
unloading. Stopped, running Delivery vehicles have impacts from the
exhaust, noise and "parking" if you can call stopping in a
roadway parking.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of

Air Pollution-Diesel Delivery Vehicle Exhaust Particulates.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 263 - AIR POLLUTION-DIESEL VEHICLE EXHAUST PARTICULATES DURING CONSTRUCTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Diesel Vehicle Exhaust Particulates during Construction.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

How many pounds of diesel fuel does each vehicle burn per hour?

How many hours per day will each vehicle operate?

What is the maximum amount of diesel fuel which could be burned by all
engines combined per day? Include vehicles (e.g. Bulldozers, Trucks) and
stationary sources such as Generators.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Diesel Vehicle Exhaust Particulates during Construction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 264 - ELECTROSTATIC PRECIPITATOR FOR DIESEL EXHAUST PIPES.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Electrostatic Precipitator for Diesel Exhaust Pipes.

Electrostatic Precipitators can remove up to 99 percent of particulate pollution from coal fired electric plants. (Environmental Science; Morgan, Moran & Weirsma; W.C. Brown Pub. 1993, p 359) It is reasonable to assume that Electrostatic Precipitators can remove significant percentages and amounts of Diesel particulates.

* 265 - VEHICLE EXHAUST - STARTUP.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Vehicle Exhaust - Startup.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

The first five minutes of automobile exhaust causes a very high amount of air pollution.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Vehicle Exhaust - Startup.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 266 - TRUCK EXHAUST.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Truck Exhaust.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Trucks typically burn diesel fuel.
There is no regulation of diesel exhaust pollution.
Truck exhaust increases as they accelerate from a stop.
Truck exhaust increases as they whine uphill.

"Diesel trucks and buses are two of the worst polluters and account for 27 percent of smog and soot produced by all of the nation's motor vehicles. This pollution threatens air quality of wildlife habitat in urban and suburban landscapes."
DENLines, Friday, Aug 11, 2000 (Defenders of Wildlife newsletter)

"Though they constitute only one in 50 vehicles on California's roads, diesel trucks and buses contributes 60 percent of the soot that comes from motor vehicles and 30 percent of the nitrogen oxides."
San Jose Mercury Editorial, May 2000

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance of
Truck Exhaust.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 267 - DELIVERY VEHICLES EXHAUST.**

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Delivery Vehicles Exhaust.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Delivery vehicles almost always use diesel engines.
Delivery vehicles almost always leave their engines running.
Stopped, running Delivery vehicles have impacts from the exhaust, noise
and "parking" if you can call stopping in a roadway parking.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Delivery Vehicles Exhaust.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 268 - DOG BARKING.**

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Dog Barking.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Very Large Dogs, Barking and Howling" can generate 85 decibels.

National Institute Deafness, Acoustic consultants and airport consultants, cited by E. Knapp AIA, Architect - Analyst, Eagan MN,
Specialist in Animal Facility Design & Planning.

Dogs Barking can make 80 dbA at 10 meters. from
"Operational Conditions
for Continuous Mining Systems in Hard Rock Open Pit Mines", 15-08-1996

This is about the same noise level as a loud sink garbage disposal.

"Unhealthy noise shall include, but not be limited to, that noise

created by a dog barking for 15 continuous minutes."
Smithtown, New York
Town Ordinance, 1984

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Dog Barking.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 269 - MOVE THE NOISY ACTIVITY.

Each time you double or halve the distance to the noise source, the noise level changes by 6dBA.

This effect can be nullified and even reversed, by noise reflection from smooth surfaces including water, buildings, roads and atmospheric inversions.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Move the Noisy Activity.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Move the Noisy Activity.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Move the Noisy Activity.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Move the Noisy Activity.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Move the Noisy Activity.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Move the Noisy Activity.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 270 - ENCLOSE THE NOISY ACTIVITY.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Enclose the Noisy Activity.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Enclose the Noisy Activity.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Enclose the Noisy Activity.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Enclose the Noisy Activity.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:

Enclose the Noisy Activity.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
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NEW LEVEL IF SUCCESSFUL

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E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

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G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines

listed above.

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G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

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L1. Please explain clearly how the primary mitigation measure will be fully enforced.

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M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

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MITIGATION IMPACTS

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O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

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Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 271 - ANTINOISE TECHNOLOGY.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:

Antinoise Technology.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Antinoise Technology.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Antinoise Technology.

using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Antinoise Technology.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Antinoise Technology.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Antinoise Technology.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 272 - REQUIRE MUFFLERS LIMITING NOISE TO AMBIENT.

"Mufflers to reduce noise to ambient and near ambient can be purchased inexpensively off the shelf, or quickly and cheaply adapted for all size construction vehicle engines, generators or any other internal combustion engine. An effective muffler can even be adapted for a gas powered chainsaw though it may prove bulkier and heavier." David Dilworth, Vehicle Engineer and Designer.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Require Mufflers Limiting Noise to Ambient.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Require Mufflers Limiting Noise to Ambient.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Require Mufflers Limiting Noise to Ambient.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Require Mufflers Limiting Noise to Ambient.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Require Mufflers Limiting Noise to Ambient.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Require Mufflers Limiting Noise to Ambient.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be

fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 273 - PROHIBIT THE NOISY ACTIVITY AND ENFORCE PENALTIES.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:

Prohibit the Noisy Activity and Enforce Penalties.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Prohibit the Noisy Activity and Enforce Penalties.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Prohibit the Noisy Activity and Enforce Penalties.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Prohibit the Noisy Activity and Enforce Penalties.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Prohibit the Noisy Activity and Enforce Penalties.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Prohibit the Noisy Activity and Enforce Penalties.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

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G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

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G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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L1. Please explain clearly how the primary mitigation measure will be fully enforced.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 274 - PROHIBITION AND PENALTIES FOR NOISE EXCEEDING AMBIENT BY 5 DBA BEFORE 9AM.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:

Prohibition and Penalties for Noise Exceeding Ambient by 5 dbA before 9am.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Prohibition and Penalties for Noise Exceeding Ambient by 5 dbA before 9am.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Prohibition and Penalties for Noise Exceeding Ambient by 5 dbA before 9am.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Prohibition and Penalties for Noise Exceeding Ambient by 5 dbA before 9am.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Prohibition and Penalties for Noise Exceeding Ambient by 5 dbA before 9am.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Prohibition and Penalties for Noise Exceeding Ambient by 5 dbA before 9am.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

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P1. Please list all potential impacts from the secondary mitigation measure

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P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 275 - CONSTRUCTION PROHIBITION BETWEEN CERTAIN HOURS.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Construction Prohibition Between Certain Hours.

A typical noise mitigation measure is to prohibit construction between the hours of 5 pm and 9 am.

This measure provides ZERO noise mitigation for people who must be home during the day including infants, immobile people, those who work at home, and those who are retired.

* 276 - PROMOTE DEAFNESS AS AN ASSET.

"A former Toledo Mayor's solution to airport noise was to move in people who were hard of hearing." Unte Reader, "Now Hear This," Sept 1998

"The construction would take place adjacent to the Hearing Center, an agency for the hard of hearing, so there would be no potentially significant environmental noise impact." Environmental Impact Report for Pile Driving, Coughman & Bread Consultants, January 1999

The first paragraph above is real. The second is fiction.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Promote Deafness as an Asset.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Promote Deafness as an Asset.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Promote Deafness as an Asset.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful

implementation of an identical or reasonably identical example for the primary mitigation measure: Promote Deafness as an Asset.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Promote Deafness as an Asset.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Promote Deafness as an Asset.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 277 - HAMMERING NAILS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of Hammering Nails.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Hammering Nails can generate 130 dBA.
The sounds lasts only about 10 ms.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Hammering Nails.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 278 - MONTEREY BAY NATIONAL MARINE SANCTUARY.

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on Monterey Bay National Marine Sanctuary.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The Monterey Bay National Marine Sanctuary is a federally protected marine area stretching from Marin to Cambria and from the mean high water line to a maximum of 50 miles offshore. It encompasses 276 miles of shore and covers 5,322 square miles. It was established primarily to protect natural resources. It is home to a rich diversity of living organisms.

National Marine Sanctuaries Act requires Federal Lead agency to consult with Dept of Commerce on any activities "that are likely to destroy, cause the loss of or injure any sanctuary resource." (16 USC Sec 1434 (d))

Aircraft traffic at 500 feet is prohibited within a Sanctuary near wildlife species.

"One of the largest California Sea Lion haulouts in central California is at the end of the Coast Guard pier in Monterey." NOAA comments on Marine Exercise Mar 1, 1999

Federal regulations governing the MBNMS require all DOD activities affecting the Sanctuary to be "carried out in a manner that avoids to the maximum extent practicable any adverse impacts on Sanctuary resources and qualities" 15 CFR Sec 922.132 (c)(1)

MMPA The Marine Mammal Protection Act 1972, USC 16 establishes a moratorium on the taking ("harass, hunt, capture or kill") and importation of marine mammals and marine mammal products, with exceptions for scientific research, allowable incidental taking, exemptions for subsistence activities by Alaskan natives and hardship exemptions (16 U.S.C. 1371). It requires all private or public actions that intentionally take marine mammals to get a permit.

It covers marine mammals that are: a) morphologically adapted to the marine environment (including sea otters and members of the order Sirenia, Pinnipedia and Cetacea), and b) primarily inhabit the marine environment (e.g., polar bears) FWS covers polar bears, sea otters, walrus, manatees and dugongs. NMFS covers the rest.

All whales, sea lions, harbor seals and sea otters are protected under the Marine Mammal Protection Act. The act was created because of a film of tuna fishermen killing Dolphins.

"Monterey Bay" is in the preliminary list of acoustic hotspots compiled by National Resources Defense Council report Summer 1999 due to Shipping, pleasure craft and the ATOC project. In addition there are regular visits by large military ships, explosives use proposed by coastal developers (Final EIR Cannery Row Market Place in Monterey), kelp harvesting boats, commercial fishing boats (including deep sea trawlers), and whale watching boats.

Some fishing is conducted at night with blazing light arrays to attract squid and fish. This may violate the MMPA.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Monterey Bay National Marine Sanctuary.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 279 - CARMEL BAY AREA OF SPECIAL BIOLOGICAL SIGNIFICANCE (ASBS).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Carmel Bay Area of Special Biological Significance (ASBS).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Carmel Bay is designated by the state of California as an Area of

Special Biological Significance (ASBS).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Carmel Bay Area of Special Biological Significance (ASBS).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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*** 280 - CARMEL BAY ECOLOGICAL RESERVE.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Carmel Bay Ecological Reserve.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Invertebrates may not be taken. No commercial fishing except kelp harvesting. This includes all waters inshore of a line from Pescadero Pt to Granite Point in Point Lobos. It also includes the unattached "Pinnacles" underwater rocks.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Carmel Bay Ecological Reserve.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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*** 281 - POINT LOBOS STATE RESERVE.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Point Lobos State Reserve.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The marine portion of Point Lobos is an Ecological Reserve, a DFG classification. No fishing or taking of any kind permitted. "It is illegal to disturb or take any plant or marine life within the

reserve or or within the adjoining underwater Ecological Reserve."
-California Coastal Access Guide, California Coastal Commission 1981

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Point Lobos State Reserve.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 282 - CALIFORNIA SEA OTTER STATE GAME REFUGE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on California Sea Otter State Game Refuge.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This is a protected marine area along the Big Sur Coast. Aircraft are prohibited from flying lower than 1000 feet without a permit. (?)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Sea Otter State Game Refuge.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
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 34. Please list, describe and quantify all Growth impacts related to this one.
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 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
 37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
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 41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
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 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 283 - HIGHWAY ONE AS A SCENIC HIGHWAY.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Highway One as a Scenic Highway.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- State Highway Code Sec 261 states the Scenic highways "require continuing and careful coordination of planning, design, construction, and regulation of land use and development, by state and local agencies
- as appropriate, to protect the social and economic values provided by the state's scenic resources."
- Highway One is an officially designated Scenic Highway.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Highway One as a Scenic Highway.
 - 1b. If no objective criteria are used please state that clearly.
 2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
 - 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
 - 3b. Please quote the definition used.
 4. If no measurement units are used please state that clearly.
 - 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
 - 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
 6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
 7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
 8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
 9. Please state the variance's MARGINS of ERROR or confidence level.
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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 284 - HIGHWAY 68 AS A SCENIC HIGHWAY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Highway 68 as a Scenic Highway.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

State Highway Code Sec 261 states the Scenic highways "require continuing and careful coordination of planning, design, construction, and regulation of land use and development, by state and local agencies as appropriate, to protect the social and economic values provided by the state's scenic resources."

Highway 68 is an officially designated Scenic Highway.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Highway 68 as a Scenic Highway.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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12. Please state the most extreme values which could be encountered.

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* 285 - SUBDIVISIONS-RESIDENTIAL.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Subdivisions-Residential.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

This project will increase the amount of water use, groundwater or surface water pumping, impermeable surfaces, asphalt road surfaces, fencing, lighting and noise.

These will cause potentially significant environmental impacts including increased Carmel River dewatering which causes loss of habitat for listed species and has caused deaths of listed species, reduction of groundwater recharge, increased stormwater runoff, increased soil erosion, increased oil-air pollution, increased oil-water pollution, prevention of migration or immigration of wildlife which causes loss of habitat for listed species and can cause deaths of listed species.

Visual Preference Survey Results
In early 1993, Portland set out to find out what kind of neighborhoods their residents preferred (Picture This...The Results of a Visual Preference Survey, A Nelessen Associates, Princeton NJ & Seattle WA, 206-441-7579, June 1993). At 34 widely publicized public meetings, 3000 adults and 1,500 children viewed 240 slides of urban neighborhoods and shopping areas, and gave their gut responses to the scenes on a scale of -10 ("ugh," "awful") to +10 ("beautiful," "nice"). The people spoke...what did they say?

Let's look at a scene they strongly liked: a narrow tree-lined residential street, with wide sidewalks, mature trees, small bungalows mixed with articulated, not monolithic. No parking is visible except at the curb.

Another: small parks and public spaces with trees, other plantings, attractive walks, seating, tables, and maybe fountains and ponds.

Some scenes repelled them: Single family dwellings dominated by wide garage doors and driveways, with wide streets, no sidewalks and few trees.

There was a remarkable consensus. People don't like strip commercial development or large parking lots, either in shopping areas or near housing. They have a strong preference for pedestrian-oriented mixed-use development at transit station and along main streets, with higher densities in central cities.

In residential neighborhoods, viewers preferred small vernacular bungalows with pedestrian-oriented neighborhood centers. Residential densities of 25 units/acre or higher were quite acceptable if the buildings were articulated and built with quality and beauty. They loved small parks and open spaces. These results are helping to turn around 50

years of zoning policy which prohibits much of what people really prefer.

Housing Infrastructure Costs
Each house built in the U.S. in 1998 needs about \$25,000 in infrastructure including, roads, electric lines, phone lines, water pipes, sewerage pipes.
-Environmental News Network, June 15, 1999

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Subdivisions-Residential.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 286 - SWIMMING POOLS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Swimming Pools.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Swimming Pools have adverse environmental impacts including high water use, chlorine use, chlorine air and water pollution runoff.

"Swimming pools evaporate about 2 inches of water per week."

Bruce Dormody, Rancho San Clemente, personal communication

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Swimming Pools.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 287 - SOIL ECOSYSTEM.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Soil Ecosystem.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"We have to stop treating soil like dirt."
Dave Brower, LtMT, LtRR, 1995

"Soil is one of the least appreciated parts of our life-support system."
The consequences would be dire indeed if human activities were to seriously undermine the soil's ability to recycle nutrients - a process of recycling that depends on a myriad of bacteria, fungi and insects."
OSF pg 242

"Moles, Badgers and Rabbits dig impressive branching tunnel apartments."
Scientific American, Dec 1998, p 120

Each acre of soil can contain some two tons of microorganisms including
Molds (2000 pounds), Bacteria (1000 pounds), Actinomycetes (1000 pounds), Protozoa (200 pounds), Algae (100 pounds), Yeasts (100 pounds) and Viruses. Other forms of life in soil include plant roots, earthworms, mites and insects. Encyclopedia of Biological Sciences,
Gray, 1961 McGraw-Hill

There are billions of microorganisms in a single teaspoon of topsoil.
-Audubon, Almanac of the Environment, 1994

As a generality Soil contains ~ 45% minerals, 20-30% air, 20-30% water and 5% organic material.

"The presence of moisture in soil is essential for the development of microorganisms. Most mineral soils display optimum microbial activity at moisture levels close to 60% saturation." Encyclopedia of Biological Sciences, Gray, 1961 McGraw-Hill

By contributing to formation of humus, microorganisms increase soil's drought resistance, base exchange capacity and protection of the microorganisms themselves from chemical pesticides. Ibid

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Soil Ecosystem.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 288 - SOIL STRUCTURE.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Soil Structure.

One can place all the native ingredients of a soil on the ground, but there is no evidence that this replaces a former soil structure.

* 289 - SOIL REMOVAL.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Soil Removal.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Removing soil can permanently change or destroy the ability of land
to support plant life. Some soils take a million years or more to create.

A single truck can carry about 10 cubic yards of soil or rock. Every 100 cubic yards of material removed requires at least 10 round trip truck trips - or 20 one-way truck trips. This does not include the heavy vehicle trips required for the equipment to load the trucks nor the support vehicles used by the employees.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Soil Removal.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 290 - CONSTRUCTION CAUSED LOSS OF TOPSOIL.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Construction Caused Loss of Topsoil.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance of Construction Caused Loss of Topsoil.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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10. Please state whether this MARGIN of ERROR is measured or assumed.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 291 - PESTICIDE IMPACTS ON SOIL ECOSYSTEM.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Pesticide Impacts on Soil Ecosystem.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Soil is one of the least appreciated parts of our life-support system."
The consequences would be dire indeed if human activities were to seriously undermine the soil's ability to recycle nutrients - a process of recycling that depends on a myriad of bacteria, fungi and insects."
OSF pg 242

There are billions of microorganisms in a single teaspoon of topsoil.
-Audubon, Almanac of the Environment, 1994

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pesticide Impacts on Soil Ecosystem.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30 Please describe all potential CUMULATIVE impacts related to this one.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 292 - PESTICIDE IMPACTS ON MICROORGANISMS.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Pesticide Impacts on Microorganisms.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"A cubic centimeter of forest soil typically contains 1200 - 1300 individual species of microorganisms." Dr. Arthur Partridge, U of Idaho, Professor Emeritus, Forest Ecosystems

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pesticide Impacts on Microorganisms.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
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15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
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-
- * 293 - MICROBE BIOMASS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Microbe Biomass.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- Soil microbes are the agents of organic change. They breakdown carbon, nitrogen and phosphorus compounds into a form that plants can take up into their root systems as nutrients.
- Less microbes means more fertilizer must be applied to crops.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Microbe Biomass.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
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- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
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 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
 23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 24. Please state whether the MARGIN of ERROR is measured or assumed.
 25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
 26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 27. Please state whether the MARGIN of ERROR is measured or assumed.
 28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
 29. Please list all potential CUMULATIVE impacts related to this one.
 - 30 Please describe all potential CUMULATIVE impacts related to this one.
 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergetic impacts.
 33. Please list, describe and quantify all Construction impacts related to this one.
 34. Please list, describe and quantify all Growth impacts related to this one.
 35. Please list, describe and quantify all Indirect impacts related to this one.
 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
 37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
 38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
 39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
 40. Please state whether the margin of error is measured or assumed.
 41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
 42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
 43. Please name each EXPERT who prepared and reviewed this impact.
 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 294 - MICROBE BIODIVERSITY.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Microbe Biodiversity.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Microbe Biodiversity.
- 1b. If no objective criteria are used please state that clearly.
 2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
 - 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
 - 3b. Please quote the definition used.
 4. If no measurement units are used please state that clearly.
 - 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
 - 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
 6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
 7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
 8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
 9. Please state the variance's MARGINS of ERROR or confidence level.
 10. Please state whether this MARGIN of ERROR is measured or assumed.
 11. If an average is used, please state which kind of average.
 12. Please state the most extreme values which could be encountered.
 13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
 14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows

whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 295 - PESTICIDE IMPACTS ON MICROBE BIOMASS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Pesticide Impacts on Microbe Biomass.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Soil microbes are the agents of organic change. They breakdown carbon, nitrogen and phosphorus compounds into a form that plants can take up into their root systems as nutrients.

Less microbes means more fertilizer must be applied to crops.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Pesticide Impacts on Microbe Biomass.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 296 - LOSS OF TOPSOIL.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Loss of Topsoil.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The world loses 7 percent of its topsoil per decade.
-Audubon, Almanac of the Environment, 1994

It can take 5000 years to produce five inches of topsoil. Ibid

Please quantify maximum potential topsoil (A,B & C horizons) loss in mass.

How many cubic meters (or yards) of soil will be moved?

Moving soil or rocks by truck on public roads requires a weight ticket for each load.

How will the weight of each truckload be monitored completely and

accurately?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Loss of Topsoil.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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*** 297 - SOIL DEPTH.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Soil Depth.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Please quantify and map soil (A,B & C horizons) loss in centimeters (or inches).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Soil Depth.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

*** 298 - SOIL FERTILITY.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Soil Fertility.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

There are billions of microorganisms in a single teaspoon of topsoil.

-Audubon, Almanac of the Environment, 1994

Please describe and quantify the minerals, organic material and pH in the potentially lost soils soil (A,B & C horizons) in terms of soil fertility.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Soil Fertility.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 299 - INCREASED IMPERMEABLE SURFACE AREA REDUCING GROUNDWATER RECHARGE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Increased Impermeable Surface Area Reducing
Groundwater Recharge.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Increased impervious or impermeable area harms rain infiltration.
Impervious surfaces include buildings, homes, parking lots and streets.
"Naturally occurring undisturbed areas typically infiltrate 60 percent of rain depending on soil type. Clearing and grading a site typically removes existing vegetated areas that retain the inherent infiltration capacity of undisturbed areas." AMBAG's Pajaro River Watershed Management Draft Plan March 1999

"In the mid-Atlantic states an acre of impervious area may reduce groundwater recharge and groundwater flow to wetlands, streams, tidal waters by 300,000 (almost one acre foot) gallons per year. A decline in recharge may also affect the amount of water available to those who get their water through wells." The Cumulative Effects of Land Development on Streams, Rivers, Lakes, Tidal Waters & Wetlands, by Richard Klein 1979

If a forest is converted to managed turf, then recharge may decrease by 15% (EPA, 1982. Results of the Nationwide Urban Runoff Program. Vol. 1 & Appendices, Water Planning Division).
"For each acre of forestland replaced with grass, base flow may diminish by 41,000 gallons per year. Converting that same acre to a parking lot or a clubhouse site would prevent the entire quarter-million gallons of rainfall from becoming base flow." Richard Klein, 1993

Please provide clear factual basis and reasoning how any Groundwater Recharge lost to an increase in impervious surface might be reduced

(e.g. locations, size in areas).

Please use as impact measuring criteria: area and provide a map.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Increased Impermeable Surface Area Reducing Groundwater Recharge.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 300 - IMPERMEABLE SURFACE AREA INCREASING STORM RUNOFF.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Impermeable Surface Area Increasing Storm Runoff.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Watersheds affected include --
Asilomar Beach Creek, borders Pebble Beach
Lake Majella (artificial in early 1900's)
Majella Seep - on USGS Maps
Sawmill Gulch
South Moss Beach Stream
Marcheta Lane creek (thru MPCC Gc)
Seal Rock Creek
Indian Village Creek
Cypress Point Golf Course Drainage & Wetland
East Stillwater
North Carmel Beach (Jeffers') Stream
Pescadero Creek

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Impermeable Surface Area Increasing Storm Runoff.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.	26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	Please carefully analyze and disclose the potential impacts of Impermeable Surface Area Harming Trees & Vegetation.
5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.	27. Please state whether the MARGIN of ERROR is measured or assumed.	If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.	28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.	Impermeable Surface Areas prevent and restrict rain from reaching Trees and plant roots.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.	29. Please list all potential CUMULATIVE impacts related to this one.	QUANTIFICATION OF BASELINES AND IMPACTS: This impact appears to be potentially significant.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.	30. Please describe all potential CUMULATIVE impacts related to this one.	1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Impermeable Surface Area Harming Trees & Vegetation.
9. Please state the variance's MARGINS of ERROR or confidence level.	31. Please quantify all potential CUMULATIVE impacts related to this one.	1b. If no objective criteria are used please state that clearly.
10. Please state whether this MARGIN of ERROR is measured or assumed.	32. Please list, describe and quantify all potential compound and synergetic impacts.	2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
11. If an average is used, please state which kind of average.	33. Please list, describe and quantify all Construction impacts related to this one.	3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
12. Please state the most extreme values which could be encountered.	34. Please list, describe and quantify all Growth impacts related to this one.	3b. Please quote the definition used.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.	35. Please list, describe and quantify all Indirect impacts related to this one.	4. If no measurement units are used please state that clearly.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.	36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.	5a. Please state the METHOD of measurement used to determine the significance for each criteria.
15. Please provide a graph of HISTORICAL measurements.	37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.	5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
16. Please quantify the length of time this impact would last.	38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.	6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.	39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.	7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.	40. Please state whether the margin of error is measured or assumed.	8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.	41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.	9. Please state the variance's MARGINS of ERROR or confidence level.
20a. Please state whether this MARGIN of ERROR is measured or assumed.	42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.	10. Please state whether this MARGIN of ERROR is measured or assumed.
20b. If no margin of error is used please state that clearly.	43. Please name each EXPERT who prepared and reviewed this impact.	11. If an average is used, please state which kind of average.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.	44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.	12. Please state the most extreme values which could be encountered.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.	45. Please provide AVOIDANCE MITIGATION for this impact.	13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	46. Please provide the reverse of this impact as Mitigation.	14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
24. Please state whether the MARGIN of ERROR is measured or assumed.	47. Please provide an ALTERNATIVE which avoids this impact.	15. Please provide a graph of HISTORICAL measurements.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.	48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.	16. Please quantify the length of time this impact would last.
	-	17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
	* 301 - IMPERMEABLE SURFACE AREA HARMING TREES & VEGETATION.	
	The Document appears to have ignored this potentially significant Impact.	

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 302 - SIDEWALK AND ROAD BUMPS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Sidewalk and Road Bumps.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Impermeable surface areas prevent and restrict rain from reaching tree and plant roots. Ordinary roots rarely break the soil surface, but when root watering by rainfall is prevented or restricted by impervious surfaces the roots rise and grow upwards often breaking through sidewalks and streets.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Sidewalk and Road Bumps.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 303 - REMOVAL OF IMPERVIOUS SURFACES.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Removal of Impervious Surfaces.

So there is no net loss of impervious surface, an area at least equal to the proposed increase of impervious surface should be cleared of covering.

* 304 - DRIVEWAYS AND PARKING AREAS MADE WITH "GRASSCRETE".

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Driveways and Parking Areas made with "Grasscrete".

The use of "Grasscrete" or other similar coverings can almost completely eliminate increased stormwater runoff that would occur with a paved area.

* 305 - SIDEWALKS MADE WITH INTERLOCKING PAVERS.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Sidewalks made with Interlocking Pavers.

The use of "Grasscrete" or Interlocking Pavers or other similar coverings allows some water to percolate into the soil to nourish trees and other plants and vegetation living in sidewalk planters. The use of Interlocking Pavers is in Carmel-by-the-Sea's Driveway and Public ways policies.

* 306 - NATIVE TREE PLANTING TO REDUCE RUNOFF.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Native Tree Planting to Reduce Runoff.

California Code 4799.07. The Legislature finds and declares that:
(e) Trees also help reduce noise, provide habitat for songbirds and other wildlife, reduce surface runoff and protect urban water resources,

and enhance the aesthetic quality of life in the city.

* 307 - STORMWATER DIVERSION FROM ORIGINAL WATERSHED.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Stormwater Diversion from Original Watershed.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

When streets are paved and gutters installed stormwater is normally channeled into stormwater capture and guidance systems. On gently sloping ground with subtle watershed divides (such as Pacific Grove California, stormwater guidance systems can and do redirect stormwater flows into adjacent watersheds. This can increase non-point source pollutants in the new watershed and decrease the freshwater flows and the nutrients it delivers in the former watershed.

Please use as impact measuring criteria: weight or mass of water diverted.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Stormwater Diversion from Original Watershed.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.	32. Please list, describe and quantify all potential compound and synergetic impacts.	why it is not feasible.
11. If an average is used, please state which kind of average.	33. Please list, describe and quantify all Construction impacts related to this one.	Please carefully analyze and disclose the potential benefits of Conservation Easements to Protect Existing Vegetation and Undisturbed Areas.
12. Please state the most extreme values which could be encountered.	34. Please list, describe and quantify all Growth impacts related to this one.	-
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.	35. Please list, describe and quantify all Indirect impacts related to this one.	* 310 - SMALLER FOOTPRINT STRUCTURES TO MINIMIZE IMPERVIOUS SURFACES.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.	36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.	The Document appears to have ignored this potentially feasible Alternative. Please carefully analyze and disclose the potential benefits of Smaller Footprint Structures to Minimize Impervious Surfaces.
15. Please provide a graph of HISTORICAL measurements.	37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.	The smaller the structure footprint, the less the impervious surface loss.
16. Please quantify the length of time this impact would last.	38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.	ALTERNATIVE FACTUAL ANALYSIS
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.	39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.	There is little or no factual evidence in the document showing why this alternative is infeasible.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.	40. Please state whether the margin of error is measured or assumed.	A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.	41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.	A1. If no objective criteria are used please state that clearly.
20s. Please state whether this MARGIN of ERROR is measured or assumed.	42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.	A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.
20b. If no margin of error is used please state that clearly.	43. Please name each EXPERT who prepared and reviewed this impact.	B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.	44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.	B1. If no measurement units are used please state that clearly.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.	45. Please provide AVOIDANCE MITIGATION for this impact.	C. Please state the method of measurement used to determine the value for each criteria.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	46. Please provide the reverse of this impact as Mitigation.	C1. If no measurement units are used please state that clearly for each criteria.
24. Please state whether the MARGIN of ERROR is measured or assumed.	47. Please provide an ALTERNATIVE which avoids this impact.	C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.	48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.	D. Please state the existing or current baseline measurement (level) for each criteria.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	-	E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.
27. Please state whether the MARGIN of ERROR is measured or assumed.	* 308 - LAND CLEARING AND SOIL COMPACTION LIMITED TO SMALLEST AREA POSSIBLE. The Document appears to have ignored this potentially feasible Mitigation. If you do not adopt this mitigation measure, please explain fully why it is not feasible. Please carefully analyze and disclose the potential benefits of Land Clearing and Soil Compaction Limited to Smallest Area Possible.	E1. If an average is used, please state which kind of average.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.	-	E2. Please state the extreme conditions which will be encountered.
29. Please list all potential CUMULATIVE impacts related to this one.	* 309 - CONSERVATION EASEMENTS TO PROTECT EXISTING VEGETATION AND UNDISTURBED AREAS. The Document appears to have ignored this potentially feasible Mitigation. If you do not adopt this mitigation measure, please explain fully	F. Please provide a graph of historical measurement.
30 Please describe all potential CUMULATIVE impacts related to this one.		G. Please state the measured, assumed or expected margin of error for each
31. Please quantify all potential CUMULATIVE impacts related to this one.		

measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 311 - INCREASED SOIL EROSION.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Increased Soil Erosion.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

"Bulldozing away a forest can increase soil erosion by 10 to 1,000 fold. The mud washed from a typical construction site can damage three miles of downstream waters with recovery taking up to a century." The Cumulative Effects of Land Development on Streams, Rivers, Lakes, Tidal Waters & Wetlands, by Richard Klein 1979

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Increased Soil Erosion.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 312 - STREAMBED EROSION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Streambed Erosion.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Streambed Erosion.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 313 - STREAMBANK EROSION FROM SEWAGE DISCHARGE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Streambank Erosion from Sewage Discharge.

If you claim the document contains proof of no-significant-impact for

this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Streambank Erosion from Sewage Discharge.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 314 - SOIL AGE.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of Soil Age.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The soils in Monterey Peninsula's Jeffers Forest are estimated to be at least 750,000 years old and more likely one million years old.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Soil Age.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 315 - ECOSYSTEM AGE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Ecosystem Age.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Ecosystems typically take tens of thousands of years to establish and stabilize. Some ecosystems can take millions of years to establish.
Considering the age of some tree species at 4,000 to 5,000 years, ten

thousand years is only two generations.

It can take 5000 years to produce five inches of topsoil.
-Audubon, Almanac of the Environment, 1994

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Ecosystem Age.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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46. Please provide the reverse of this impact as Mitigation.
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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 316 - SCHOOLS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Schools.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- Noises and smells can distract from the purpose of schools.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Schools.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
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4. If no measurement units are used please state that clearly.
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* 317 - LIBRARIES.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Libraries.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Noises and smells can distract from the purpose of libraries.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance on Libraries.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 318 - IMMOBILE POPULATIONS.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Immobile Populations.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Immobile populations include schools, hospitals, convalescent homes, prisons, facilities for the mentally ill, dwellings where residents cannot leave the area without assistance from other people.

Noise, Hazardous Waste and Air Pollution can harm these populations who are helpless to get out of harm's way - let alone object.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Immobile Populations.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 319 - UNEDUCATED POPULATIONS.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Uneducated Populations.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Newspaper readership is declining since the 1950s. Project Censored of Sonoma State University documents how government and corporations intentionally fail to report harms to citizens. The book "Doublespeak" documents how government and corporations intentionally hide harms to citizens through use of euphemisms.

When the public does not understand the risks to themselves, they

do not know to protect themselves or to object to such activities.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Uneducated Populations.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 320 - PIPELINE.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of Pipeline.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The US has some 2.2 million miles of pipelines carrying natural gas and other hazardous materials. AP June 17, 2000

This project will increase the mileage of natural gas lines in Pebble Beach.

ACCIDENTS - Fires & Explosions
Accidents are always a high risk. "An average of 22 people died annually from 1988 to 1998" from pipeline accidents. AP June 17,00

"Forty-two (42) people were killed by natural gas pipeline accidents between 1986 and June 30 (2000), according to statistics of the Office of Pipeline Safety, an agency of the National Transportation Safety Board." AP August, 22, 2000

"Gas pipeline blast kills 10 campers" AP Headline Aug 21, 2000
At Carlsbad NM near the banks of the Pecos river a pipeline 5 to 6 feet underground exploded leaving a crater some 20 feet deep, 86 feet long and 46 feet wide. The eleven (another man died a few days later) dead people, including five children, were sleeping some 200 feet from the pipeline.

In the early 1990's? in Louisiana 11 people were killed by an explosion caused by a natural gas pipeline leak. If such an explosion happened near GINS, it could harm or kill boaters, island visitors, and wildlife such as the endangered bald eagle.

"Federal Regulators sought a record fine of more than \$3 million against Olympic Pipeline Co. for numerous safety violations after two

10-year-old boys and an 18-year-old fisherman died after a pipeline operated by Olympic broke June 10, (1999) spewing 230,000 gallons of gasoline into a Bellingham park. The spilled gasoline ignited an enormous fireball that raced more than a mile down a creek." AP Jun 3, 2000

"Chemicals known to the state of California to cause cancer, birth defects, or other reproductive harm are found in and around facilities that produce, handle transport, store or sell crude oil and petroleum and chemical products. Facilities covered by this warning include pipeline systems..." Proposition 65 disclosure advertisement, May 2000, by Arco, Chevron, Texaco, Tosco and others.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pipeline.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 321 - INTRINSIC VALUE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Intrinsic Value.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Establishing value of environmental aspects merely in terms of use to humans such as economic value or even ecological roles is too narrow.

The very existence of a life form gives it the right to survive.

We do have aliens here on Earth, astounding unfamiliar life forms.
They're right in front of us in every forest, wetland and under the sea.

We have Zero evidence of any life anywhere else in the Universe. Most life forms we do know of took Billions of years and millions of generations to get to their present form.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Intrinsic Value.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows

whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 322 - ANIMAL BIOMASS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Animal Biomass.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Animal Biomass.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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 28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
 29. Please list all potential CUMULATIVE impacts related to this one.
 30. Please describe all potential CUMULATIVE impacts related to this one.
 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergistic impacts.
 33. Please list, describe and quantify all Construction impacts related to this one.
 34. Please list, describe and quantify all Growth impacts related to this one.
 35. Please list, describe and quantify all Indirect impacts related to this one.
 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
 37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
 38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
 39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
 40. Please state whether the margin of error is measured or assumed.
 41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
 42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
 43. Please name each EXPERT who prepared and reviewed this impact.
 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 323 - ANIMAL BIOMASS TO VEGETATION BIOMASS RATIO.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Animal Biomass to Vegetation Biomass Ratio.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Animal Biomass to Vegetation Biomass Ratio.
 - 1b. If no objective criteria are used please state that clearly.
 2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
 - 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
 - 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
 - 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
 - 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
 6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
 7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
 8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
 9. Please state the variance's MARGINS of ERROR or confidence level.
 10. Please state whether this MARGIN of ERROR is measured or assumed.
 11. If an average is used, please state which kind of average.
 12. Please state the most extreme values which could be encountered.
 13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
 14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
 23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 24. Please state whether the MARGIN of ERROR is measured or assumed.
 25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
- 30 Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 324 - LIVING BIOMASS LOSS - TREE CUTTING WITHOUT REMOVAL.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Living Biomass Loss - Tree Cutting Without Removal.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- Utility Corporations often cut trees without removing them from their
native location. While such activity is not a local physical biomass
loss, killing the trees is a loss of living biomass.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Living Biomass Loss - Tree Cutting Without Removal.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
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- 30 Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 325 - FOREST BIOMASS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Forest Biomass.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

While a typical old growth forest biomass is some 400 tons per acre, an
old growth redwood forest can easily have a biomass of 1800 tons per
acre. A rainforest typically contains some 180 tons of biomass per acre.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Forest Biomass.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 326 - SOIL BIOMASS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Soil Biomass.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Each acre of soil can contain some two tons of microorganisms including Molds (2000 pounds), Bacteria (1000 pounds), Actinomycetes (1000 pounds), Protozoa (200 pounds), Algae (100 pounds), Yeasts (100 pounds) and Viruses. Other forms of life in soil include plant roots, earthworms, mites and insects. Encyclopedia of Biological Sciences, Gray, 1961 McGraw-Hill

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Soil Biomass.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 327 - WILD-LIFE HABITAT LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Wild-Life Habitat Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Most wildlife populations extinguished by humans were eliminated by accident, often in spite of vigorous attempts to avert the extinction. In contrast most premeditated attempts to destroy a population have been unsuccessful. The paradox is less puzzling when it is realized that unplanned exterminations are usually caused by a change in the animal's habitat, whereas the planned attempts are usually aimed at the animals themselves. The message is clear: populations are more vulnerable to a manipulation of their habitat than they are to the direct manipulation of their numbers. An environment change tends to affect one or more of the habitat components (food, cover, water and space); and, when this change is deleterious, the population cannot necessarily adjust to it by lowering density..." Caughtley 1978, Analysis of vertebrate populations, p 200 John Wiley & Sons cited by California Department of Fish and Game "Furbearing and Nongame Mammal Trapping" ED, April 6, 2001

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Wild-Life Habitat Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 328 - WILD-LAND HABITAT LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Wild-Land Habitat Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Wild-Land Habitat Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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 16. Please quantify the length of time this impact would last.
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 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
 23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 24. Please state whether the MARGIN of ERROR is measured or assumed.
 25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
 26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 27. Please state whether the MARGIN of ERROR is measured or assumed.
 28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
 29. Please list all potential CUMULATIVE impacts related to this one.
 - 30 Please describe all potential CUMULATIVE impacts related to this one.
 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergetic impacts.
 33. Please list, describe and quantify all Construction impacts related to this one.
 34. Please list, describe and quantify all Growth impacts related to this one.
 35. Please list, describe and quantify all Indirect impacts related to this one.
 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
 37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
 38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
 39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
 40. Please state whether the margin of error is measured or assumed.
 41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
 42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
 43. Please name each EXPERT who prepared and reviewed this impact.
 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 329 - HABITAT - LOSS / DESTRUCTION / MODIFICATION OR RESTRICTION.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Habitat - Loss / Destruction / Modification or Restriction.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Habitat - Loss / Destruction / Modification or Restriction.
 - 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
 - 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
 - 3b. Please quote the definition used.
 4. If no measurement units are used please state that clearly.
 - 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
 - 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
 6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
 7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
 8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
 9. Please state the variance's MARGINS of ERROR or confidence level.
 10. Please state whether this MARGIN of ERROR is measured or assumed.
 11. If an average is used, please state which kind of average.
 12. Please state the most extreme values which could be encountered.
 13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
 14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 330 - ECOTONES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Ecotones.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

An ecotone is the area between two dramatically different ecosystems. It is marked by a greater number of species and higher population densities. It often contains species which do not exist in either adjoining ecosystem.

A marsh or a wetland is an ecotone between the open water of a lake and the land. Another ecotone is the margin between a forest and a meadow.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Ecotones.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 331 - TREE CANOPY FOG CAPTURE LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Tree Canopy Fog Capture Loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Fog drip provides as much as 45 percent of a redwood's annual water use.
Some understory plants depend completely on fog drip. In a 3 year study, in an intact redwood forest 34 percent of the hydrologic input per year came from fog drip. After logging the fog drip contribution dropped to 17 percent. Oecologica, January 1999, Todd Dawson, Cornell University

"Studies in northern California have found that fog drip can add as much as 26 cm of precipitation to the annual total in redwood forests."

Big Sur Natural History, Henson & Usner, 1993

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Tree Canopy Fog Capture Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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*** 332 - RAINFALL LOSS DUE TO ECOSYSTEM REMOVAL.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Rainfall Loss Due to Ecosystem Removal.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

A 1994 New Yorker article described a scientific study of how a whole watershed RECEIVED less rainfall after it was clearcut.

This is a different impact than increased runoff and different from tree fog drip.

Fog-Drip is just a tree condensing fog to the ground, rain gathering is the synergetic collection of water from the atmosphere to the forest.

It is the synergetic system capability of a forest ecosystem to gather rain from passing weather systems mainly by cooling a large area using evapotranspiration and shade.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Rainfall Loss Due to Ecosystem Removal.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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*** 333 - ENVIRONMENTALLY SENSITIVE HABITAT AREA LOSS.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Environmentally Sensitive Habitat Area Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Environmentally Sensitive Habitat Areas (ESHA) defined by the California Coastal Act includes -

all endangered species habitat,
all coastal wetlands,
all coastal lagoons,
all marine life haul-out,
breeding and nesting areas,
wildlife reserves,
all tideland portions of the California Sea Otter Refuge,
nearshore reefs,
tidepools,
sea caves,
kelp beds,
islets and offshore rocks,
wilderness and primitive areas.
(source - Big Sur Local Coastal Plan)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Environmentally Sensitive Habitat Area Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 334 - ENVIRONMENTALLY SENSITIVE HABITAT AREA LOSS HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Environmentally Sensitive Habitat Area Loss Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Environmentally Sensitive Habitat Area Loss Habitat.

1b. If no objective criteria are used please state that clearly.

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3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 335 - HABITAT PROTECTION.

The Document appears to have ignored this potentially feasible Alternative.

Please carefully analyze and disclose the potential benefits of
Habitat Protection.

"Habitat destruction is the leading cause of species extinction."
-Nature, 24 Feb 2000 p 843

"Conservation Biology's central tenets are not hard to grasp. For a natural habitat to be viable (and for a conservation strategy to succeed) there is a handful of general rules: bigger is better; a single large habitat is usually better than several small, isolated ones; large native carnivores are better than none; intact habitat is preferable to artificially disturbed habitat; and connected habitats are usually better than fragmented ones." Sierra Magazine Sept/Oct 1995 p 97

"Estivation habitat is essential for the survival of California red-legged frogs within a watershed."

Genuine habitat protection prohibits any adverse modification. It also requires overwhelming proof that any proposed "non-adverse" modification would not have other adverse habitat impacts.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Wetland Loss.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

California has lost about 91 percent of the state's total wetlands. Five (5) million acres reduced to only 450,000 acres. California Dept. of Parks and Recreation 1988. The loss of this much habitat means that wildlife is under extreme pressure. Sierra Club / CALPirg Report "Our 21 Most Endangered Habitats, 1997)

The US EPA cites land development as the leading cause of recent wetland losses and accounts for 12% of the nation's degraded waters. - The Cumulative Effects of Land Development on Streams, Rivers, Lakes, Tidal Waters & Wetlands, by Richard Klein 1979

Wetlands are more broadly defined by the California Coastal Act than by the Clean Water Act (404 permits). Coastal Commission letter to Cal-Trans Dec 21 1998 (e.g. the Coastal Act includes seasonal wetlands while the federal definition only recognizes year round wetlands).

Please specify which wetland definition is being used.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Wetland Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

* 336 - WETLAND LOSS.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 337 - WETLAND ECOSYSTEM SERVICE LOSSES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Wetland Ecosystem Service Losses.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Wetlands provide approx \$14,785 in Ecosystem services per hectare per year. -"The value of the worlds ecosystem services and natural capital" by Costanza et al, Nature 15 may 1997 pg 253

"A 1981 study estimated that for each hectare of US Wetlands destroyed by development, the lost ability to soak up floodwaters increased annual flood damages by \$3300 to \$11,000." Wade Roush, Science May 16 1997 pg 1029

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Wetland Ecosystem Service Losses.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 338 - WATERS OF THE U.S. LOSS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Waters of the U.S. Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

33 CFR 328 defines Waters of the US as including navigable waterways, their tributaries (including intermittent streams), and wetlands.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Waters of the U.S. Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

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15. Please provide a graph of HISTORICAL measurements.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 339 - LAKE/RIVERS ECOSYSTEM SERVICES LOSS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Lake/Rivers Ecosystem Services Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Lakes/rivers provide approx \$8,000 in Ecosystem services per hectare per

year. "The value of the worlds ecosystem services and natural capital" by Costanza et al, Nature 15 may 1997 pg 256 Those services include: Species protection (think of what it costs to keep an endangered animal alive in a zoo, compared to a native habitat), storm protection, flood control, drought recovery and other aspects of habitat response to environmental variability mainly controlled by vegetation structure, prevention of loss of soil by wind, runoff or other removal processes, soil formation, nutrient cycling, waste treatment, pollution control, detoxification, atmospheric gas regulation, climate regulation, pollination, dynamic regulation of populations, reduction of herbivory by top predators, habitat for resident and transient populations, food, lumber, fuel and fodder production; medicine products, genes for disease resistance, ornamental species, eco-tourism, sport fishing, and other outdoor activities, aesthetic, artistic, educational, spiritual and scientific values.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Lake/Rivers Ecosystem Services Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 340 - PESCADERO CANYON WATERSHED LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Pescadero Canyon Watershed Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Pescadero Canyon Watershed Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Riparian Ecosystem Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"California Riparian Forests and Wetlands" are on the list of the 21 most Endangered Ecosystems in the United States. "Endangered Ecosystems: A Status report on America's Vanishing Habitat and Wildlife (Defenders of Wildlife, Washington DC 1995) "According to the September 1990 Smithsonian, degradation of riparian areas in the West is particularly important to control because while they represent 2 percent of the land area, they support as much as 80 percent of the wildlife." EPA "Managing Nonpoint Source Pollution" 1992 pg 189

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Riparian Ecosystem Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

* 341 - RIPARIAN ECOSYSTEM LOSS.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 342 - RIPARIAN SCRUB LOSS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Riparian Scrub Loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Riparian Scrub Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Aquatic Ecosystem Loss.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Aquatic Ecosystem Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

* 343 - AQUATIC ECOSYSTEM LOSS.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 344 - FRESHWATER MARSH LOSS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Freshwater Marsh Loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Freshwater Marsh Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 345 - VERNAL POOL LOSS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Vernal Pool Loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Vernal Pool Loss.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
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46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 346 - COASTAL AND MARINE ECOSYSTEMS LOSS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Coastal and Marine Ecosystems Loss.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Coastal and Marine Ecosystems Loss.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 347 - CLOSED-CONE PINE-CYPRESS HABITAT LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Closed-Cone Pine-Cypress Habitat Loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This habitat occurs in Monterey and Santa Cruz Counties.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Closed-Cone Pine-Cypress Habitat Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 348 - COASTAL OAK WOODLAND HABITAT LOSS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Coastal Oak Woodland Habitat Loss.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

This habitat occurs extensively in inland Monterey and Santa Cruz Counties.

"Pest rotting coastal region's oaks" Herald Headline Nov 10, 1999

"Bark beetles are killing trees that are overtly healthy," said Steve Tjesvold, a farm advisor with UC Cooperative Extension.

"The bark beetles are at epidemic proportions" said Tjesvold. The species affected are coast live oak and tanoak.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Coastal Oak Woodland Habitat Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 349 - COASTAL SCRUB LOSS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the project's potential impacts on Coastal Scrub Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This habitat occurs extensively in coastal Monterey and Santa Cruz Counties.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Coastal Scrub Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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12. Please state the most extreme values which could be encountered.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 350 - LOW TERRACE RIPARIAN FOREST LOSS.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Low Terrace Riparian Forest Loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Low Terrace Riparian Forest Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 351 - HIGH TERRACE RIPARIAN FOREST LOSS.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
High Terrace Riparian Forest Loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
High Terrace Riparian Forest Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 352 - WILDLIFE HABITAT LOSS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Wildlife Habitat Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Conservation Biology's central tenets are not hard to grasp. For a natural habitat to be viable (and for a conservation strategy to succeed) there is a handful of general rules: bigger is better; a single large habitat is usually better than several small, isolated ones; large native carnivores are better than none; intact habitat is preferable to artificially disturbed habitat; and connected habitats are usually better than fragmented ones." Sierra Magazine Sept/Oct 1995 p 97

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Wildlife Habitat Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 353 - WILDLIFE HABITAT DEGRADATION (AS OPPOSED TO LOSS).
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Wildlife Habitat Degradation (as opposed to loss).
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Wildlife Habitat Degradation (as opposed to loss).
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
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10. Please state whether this MARGIN of ERROR is measured or assumed.
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12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 354 - SPECIES IMBALANCE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Species Imbalance.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Removal of predators (e.g. bears) causes their prey (e.g. deer) to increase populations and those deer can cause an increase in vegetation loss.

"A population attacked frontally by shooting or trapping does not have to contend with deteriorating habitat but, in fact, is favored by improved habitat." Caughley 1978, Analysis of vertebrate populations, p 200 John Wiley & Sons cited by California Department of Fish and Game
"Furbearing and Nongame Mammal Trapping" ED, April 6, 2001

An increase in urban density can cause an increase in raccoon populations and their impacts on resident humans. Killing raccoons typically causes increases in raccoon populations.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Species Imbalance.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 355 - GROUNDWATER FAUNA.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Groundwater Fauna.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Groundwater Fauna.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 356 - GROUNDWATER LEVEL PATTERN IMPACTS ON VEGETATION.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Groundwater Level Pattern Impacts on Vegetation.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The vertical distribution of roots of willows and cottonwoods is related to the groundwater regime to which they are accustomed. Trees that had experienced stable groundwater levels were more susceptible to stress from groundwater decline than trees that had experienced fluctuating groundwater levels.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Groundwater Level Pattern Impacts on Vegetation.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 357 - COLONIZATION BY INVASIVE NON-NATIVE PLANTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Colonization by Invasive Non-Native Plants.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Human activity distributes a wide array of animals, plants, insects and microorganisms to new locations.

"Whether introduced intentionally or accidentally, invasive species can:
1) prey on, parasitize, outcompete, or hybridize with native species to the point of extirpation or extinction, and 2) disrupt the function of native communities and ecosystems." "The Science of Invasive Species"
Nov 2001 report, Union of Concerned Scientists.

"Biological pollution" of exotic or non-native species can cause the loss of habitat for ESA listed plants and animals. "More than 1000 exotic plants have been introduced in [California] since 1769. Eucalyptus is one of about 50 plants that have escaped cultivation and now run roughshod over wild areas." Associated Press Sept. 26 1999

Shipping Spreading Invasive Species
Shipping brought alien plants into California perhaps in the wool of sheep, in hay carried for livestock, or in the droppings of domestic

animals. "Destruction of California" Dasmann, 1966, Collier Books

Ballast Discharge Spreading Invasive Species
Ship ballast discharge has infected the Great lakes with the zebra mussel, round goby and a water flea (*Cercopagis pengoi*).

In just a handful of years the flea has exceeded 600 fleas per cubic meter of surface water in Lake Ontario - over the entire lake. It has already infested six of NY's finger lakes and it is only a matter of time before the flea enters the Mississippi river. It has few known N American predators.

At a minimum it is expected to starve out the larve of non-commercial fish, but by doing so it could indirectly trigger the collapse of to predators. "In the worst case 'we could wake up one morning with no fish in the Great Lakes, except perhaps carp.'" Science news Nov 13 1999

"In the Coastal fog belt of California, from Monterey County northward, Pampas type grasses and Scotch and French Broom are invading disturbed soils, grasslands, open woodlands and roadsides. They crowd out native plants and wildflowers, changing the appearance of the natural landscape, decreasing the food and habitats of wildlife and creating what many consider an eyesore." (Invasive Exotic Plants in Monterey County, brochure by Monterey County Planning Dept #293-0274 4/98)

Bulldozing, including new road cuts and clearing old roads, leaves an excellent opportunity for introduction and enhancement of Pampas type grasses and Scotch and French Broom.

"In the Coastal fog belt of California, from Monterey County northward, Pampas type grasses and Scotch and French Broom are invading DISTURBED soils, grasslands, open woodlands and roadsides. They crowd out native plants and wildflowers, changing the appearance of the natural landscape, decreasing the food and habitats of wildlife and creating what many consider an eyesore." (Invasive Exotic Plants in Monterey County, brochure by Monterey County Planning Dept. #293-0274 4/98)

California harmful exotics and non-natives include:
French Broom (*Cytisus monspessulanus*)
Pampas Grasses (*Cortaderia jubata* and *Cortaderia sellowana*)
Scotch Broom

"Broom forms dense thickets in many habitats, shading out native flora and tree seedlings and can limit access to recreational trails for hiking, fishing and horseback riding." (Invasive Exotic Plants in Monterey County, brochure by Monterey County Planning Dept. #293-0274 4/98)

Bullfrog - eats tadpoles of the federally listed California Red-Legged Frog (*Rana aurora draytonii*).

Bluegum Eucalyptus - which sheds bark and leaves, chokes out native plants reducing food for owls, deer and other animals. They spread so quickly they become fire hazards contributing to the Oakland Hills fire in 1991 which killed 16 people and destroyed 3000 homes.

Green Crab (*Carcinus maenas*) - eats native clams, oysters and other crabs. It threatens some birds, fish and other crabs by eating their food supply.

Hydrilla (*Hydrilla verticillata*) - clogs waterways, blocks light for other plant species and reduces fish spawning and feeding areas.

Flathead Catfish - eats chiefly other fish including endangered species.
Dandelions

Nutria - "devastating wetlands and habitat for Bald Eagles" AP Sept. 26 1999.

"Rats and feral cats have eliminated ground nesting birds in many areas, including Jamaica, Australia, New Zealand, and the Galapagos Islands." Environmental Science; Morgan, Moran & Weirsm; W.C. Brown Pub. 1993

Exotic Species. More than 130 exotic (nonnative) species have been introduced to the Great Lakes since 1800, nearly a third carried in by ships. Some exotics have profoundly damaged native species. A troublesome recent invader, the zebra mussel, probably entered the lakes via ballast water discharge from an oceangoing vessel. The full impacts of the mussel are not yet known, but they are potentially great. A prolific breeder, the mollusk devours microscopic plants at the foundation of the food web and may create a food shortage for fish that graze on these plants, ultimately threatening predator fish such as walleye, salmon, and lake trout. Colonies also foul and clog water intake pipes to water treatment and power plants.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Colonization by Invasive Non-Native Plants.

1b. If no objective criteria are used please state that clearly.

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3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 358 - MEADOWS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
of
Meadows.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Meadows.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 359 - SPECIES EXTINCTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Species Extinction.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Man is incapable of making permanent changes in the cosmos. Except one.
In only one way can man truly make his mark upon time and life and evolution: by exterminating any species of plant or animal. If he does that, if he eradicates any species or allows to fail any line of evolution through time, he will have permanently altered the life potential of the cosmos for as long as matter and energy exist."
Roger Caras, Speech, Yale School of Forestry, 10 April, 1978 (DEQ)

How much money and effort would we devote to preserve an animal species if we had found one on the moon? Is any species on earth less precious?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Species Extinction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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* 360 - BIODIVERSITY LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Biodiversity Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Biodiversity can be measured with genetic diversity, species diversity and ecosystem diversity. Biodiversity varies naturally with local surface (land or water), latitude / temperature (bird species vary from 10 to over 600 from arctic to equator), climate rainy vs desert).

Agriculture is the extreme opposite of biodiversity in that it typically involves genetically identical plants (or animals), removal of all non-harvested species and extremely controlled identical ecosystems - one genetic individual, one species and one uniform ecosystem.

Loss of Biodiversity is the only process that is wholly irreversible.
Its consequences are also the least predictable. "Threats to Biodiversity" by E.O. Wilson, Scientific American Sept 1989 pg 108

"The more diverse the plant community, the less its productivity declines during dry years and the faster it rebounded."
"Biodiversity really is an insurance policy against catastrophe. Areas with more species are more stable."
Science News, Feb 5 1994 pg 84,85

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Biodiversity Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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* 361 - GENETIC DIVERSITY LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Genetic Diversity Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

A Genetic Diversity Bottleneck is a period of reduced population size.

Genetic diversity is important in a species to provide extinction resistance due to disease. If all individuals in a species are identical clones, they will have identical resistance to a disease. This means when a disease kills one individual - all other members of the species (100 percent) can be killed just as easily by that disease.

Declining vs Rising Population

There is a large significant, measurable difference in genetic variability when you reach a Minimum Viable Population (MVP) number by a decrease or an increase in the population.

Using an arbitrary number of 1000 individuals as the initial MVP of a population, when arriving at MVP through population LOSS, you could have as many as 1000 genetically distinct individuals.

When arriving at the 1000 individuals through population GAIN, you could have as few as 2 genetically distinct individuals (with minor mutations).

When a population reaches its population from an increase and in the absence of better data, we must assume worst case for genetic diversity.

When arriving at the 1000 individuals through population gain from a population low of 50 animals, you may have a MAXIMUM of 49 genetically distinct animals (with minor mutations) or as few as 2 genetically distinct animals.

Forty-nine genetically distinct individuals is a magnitude less than the 1000 genetically distinct individuals. Two genetically distinct animals is another MAGNITUDE fewer animals.

The real MVP numbers of animals for endangered and threatened thresholds need to increase by at least a magnitude, and possibly by a second magnitude, and it needs to include a time or a generation criteria to allow for genetic diversity to increase.

Only after specific, not sample, measurements show 1000 animals of measureable wide genetic diversity should legal protection for a threatened species occur.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Genetic Diversity Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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*** 362 - ILLEGAL & INTENTIONAL AGENCY DELAY LISTING ENDANGERED & THREATENED SPECIES.**

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Illegal & Intentional Agency Delay Listing Endangered & Threatened Species.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

US-Fish & Wildlife Service (FWS) and US-National Marine Fisheries Service, SW Region - the two federal agencies charged with protecting endangered species refuse and delay listing species as Endangered & Threatened even when scientific evidence is substantial.

The Center for Biodiversity has had to sue FWS at least 4 times over ten years to list the Northern Goshawk.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Illegal & Intentional Agency Delay Listing Endangered & Threatened Species.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 363 - IMMIGRATION VS LOCAL POPULATION RECOVERY.**

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Immigration vs Local Population Recovery.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"In the Great Lakes, bald eagle numbers climbed from 26 pairs to 134 pairs between 1977 and 1993, but this recovery may be more apparent than real. US-Fish & Wildlife Service biologists believe that the growth of the Great Lakes population depends largely on immigration of eagles hatched in cleaner [non-polluted] areas." OSF, pg 154

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Immigration vs Local Population Recovery.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows

whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 364 - LOSS OF UNLISTED BUT THREATENED AND ENDANGERED SPECIES.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the project's potential impacts on
Loss of Unlisted but Threatened and Endangered Species.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Habitat destruction is the leading cause of species extinction."
-Nature, 24 Feb 2000 p 843

"Within the past decade, at least 34 species, subspecies, or vertebrate populations have become extinct while awaiting consideration for federal protection." President's Council on Environmental Quality 1990

In 1988 Congress noted that 950 species were prime candidates for listing for which the Service had taken no action. (Curtin's Land Use 1998) This shows that many species are Genuinely Threatened and Endangered with Extinction - yet they have no formal protection under the Endangered Species Act.

The Lingcod is just one of many rockfish that is in trouble. It is thought to be down to about 3 percent of its former population.
-Herald Dec 3 1999

In the last 200 years the United States has lost up to 490 species of native plants and animals with another 9,000 now at risk. (The 1993 Information Please Environmental Almanac, compiled by World Resources Institute (Houghton Mifflin, 1993, p 159)

We want you to identify and analyze the impacts on those species and habitats which are genuinely threatened but have not been officially listed.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Loss of Unlisted but Threatened and Endangered Species.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 365 - LOSS OF UNLISTED BUT THREATENED AND ENDANGERED SPECIES HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Loss of Unlisted but Threatened and Endangered Species Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Loss of Unlisted but Threatened and Endangered Species Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 366 - GENUINE BUT UNDESIGNATED CRITICAL HABITAT FOR ESA LISTED SPECIES.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Genuine but Undesignated Critical Habitat for ESA Listed Species.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- "Habitat destruction is the leading cause of species extinction."
-Nature, 24 Feb 2000 p 843
- Illegal & Intentional Agency Delay in Mapping Critical Habitat
- From 1996 to 2000 US-Fish & Wildlife Service (FWS) has failed to map
"Critical Habitat" for any species until forced to do so by lawsuit.
- US-Fish & Wildlife Service (FWS) is required by federal law to designate
Critical Habitat with a maximum delay from the date of listing of one
year. Their record of failing to do so and violating the
Endangered
Species Act (ESA) is almost perfect.
- Between April 1996 and September 1998, the FWS listed 179 species as
"Threatened" or "Endangered" under the ESA, and not once has the agency
voluntarily designated critical habitat for any of them even though
required to by law. Every single critical habitat designation that has
- been made has been forced upon the agency by a federal judge in response
to a citizen-inspired lawsuit.
- Thus there are large areas of real critical habitat for listed species
exists, but is not officially designated.
We want you to identify and analyze the impacts on those species'
habitats.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Genuine but Undesignated Critical Habitat for ESA Listed Species.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,
credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 367 - HABITAT LOSS CAUSED EXTINCTION.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Habitat Loss Caused Extinction.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Habitat destruction is the leading cause of species extinction."
-Nature, 24 Feb 2000 p 843

"...in patches [of protected areas] of between one and 20 square kilometers, a common size for reserves and parks in the tropics and elsewhere, 20 percent or more of the [bird] species disappear within 50 years." E.O. Wilson, Scientific American Sept 1989 pg 112

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Habitat Loss Caused Extinction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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34. Please list, describe and quantify all Growth impacts related to this one.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 368 - SINGLE SPECIES ANALYSIS VS ECOLOGICAL ANALYSIS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Single Species Analysis vs Ecological Analysis.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

For example: Fish
Single species management, while perhaps effective in preventing local extinctions of some [fish] stocks, has pitted the needs of listed stocks against unlisted stocks, resulting in an unworkable tool in fisheries management and restoration. Nehlson et al. 1991 and Mills et al. 1997

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Single Species Analysis vs Ecological Analysis.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 369 - CHANGES IN FOOD SUPPLY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Changes in Food Supply.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Wildlife Corridor Loss, RN
California Fish & Game Code 2781 "Corridors of natural habitat must be preserved to maintain the genetic integrity of California's wildlife."

"Few animals or plants would be able to cross Los Angeles on the way to the promised land." Robert L. Peters, in The Challenge of Global Warming, 1989

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Changes in Food Supply.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 370 - STRESS IN WILDLIFE FROM NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Stress in Wildlife from Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Stress in Wildlife from Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 371 - TRANSPLANTATION.

"Salvaging and relocating plants has not shown to be successful and, therefore is not appropriate mitigation."
US-FWS letter to Monterey County Dec 10 1997

The June 24, 1994 letter from California Department of Fish and Game
Regional Manager Brian Hunter states "Transplantation and propagation have not been shown to be effective measures to mitigate the loss of rare plant species; success rates are typically very low."

"Rare plants are generally rare not just because there is a lack of individuals, but because of the lack of suitable habitat; and an increase in numbers of individuals is not usually effective in increasing overall population numbers (or replacing lost individuals) unless there is a concomitant increase in the available habitat."

***** (WARNING):
"While relocation of rare species has met with limited success in some species, it is generally successful only in areas where suitable habitat exists that, for whatever reason, is not currently occupied by the species of concern."

Is the Transplantation experimental?

Is the proposed site currently at carrying capacity?

Why are the species absent from that area now?

Is the proposed habitat unsuitable?

Is there a proven ability to persist through environmental extremes?
What evidence is there that the alternative site can support a viable

population over the range of environmental conditions that can be expected to occur through time?

Does listing agency accept transplantation as an alternative to protecting naturally occurring populations?

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Transplantation.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Transplantation.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Transplantation.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Transplantation.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Transplantation.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Transplantation.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 372 - PROPOGATION.

The June 24, 1994 letter from California Department of Fish and Game Regional Manager Brian Hunter states "Transplantation and propagation have not been shown to be effective measures to mitigate the loss of rare plant species; success rates are typically very low."

"Rare plants are generally rare not just because there is a lack of individuals, but because of the lack of suitable habitat; and an increase in numbers of individuals is not usually effective in increasing overall population numbers (or replacing lost individuals) unless there is a concomitant increase in the available habitat."

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Propagation.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure: Propagation. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure: Propagation. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Propagation.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: Propagation.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: Propagation.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

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G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

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G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

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MONITORING FREQUENCY

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I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

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EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 373 - FIREBREAKS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Firebreaks.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Creation of Firebreaks has caused extirpation of rare plant species including "Tecate cypress in the Guatay Mt. and Otay Mt. groves, another has eliminated several Cupressus abramsiana in the bonnie Doon grove, and Knobcone pines have been destroyed in the Santa Ana Mts." Terrestrial Vegetation of California, 1988, Barbour & Major

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Firebreaks.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 374 - RINGTAIL (BASSARISCUS ASTUTUS).

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the project's potential impacts on
Ringtail (Bassariscus astutus).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The Ringtail (Bassariscus astutus) is a fully protected species which
can inhabit the Monterey Pine native forest ecosystem. PB
Lot
Program-DEIR April 1994.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Ringtail (Bassariscus astutus).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 375 - RINGTAIL (BASSARISCUS ASTUTUS) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Ringtail (Bassariscus astutus) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Ringtail (Bassariscus astutus) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
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 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
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 25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
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 27. Please state whether the MARGIN of ERROR is measured or assumed.
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 29. Please list all potential CUMULATIVE impacts related to this one.
 30. Please describe all potential CUMULATIVE impacts related to this one.
 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergetic impacts.
 33. Please list, describe and quantify all Construction impacts related to this one.
 34. Please list, describe and quantify all Growth impacts related to this one.
 35. Please list, describe and quantify all Indirect impacts related to this one.
 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
 37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
 38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
 39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
 40. Please state whether the margin of error is measured or assumed.
 41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
 42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
 43. Please name each EXPERT who prepared and reviewed this impact.
 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
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- * 376 - BEARS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Bears.
- If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.
- There are seven or eight species of bears, three in North America.
Tremarctos reached North America some 10 million years ago.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Bears.
- 1b. If no objective criteria are used please state that clearly.
 2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
 - 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
 - 3b. Please quote the definition used.
 4. If no measurement units are used please state that clearly.
 - 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
 - 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
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 8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
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 12. Please state the most extreme values which could be encountered.
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 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
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 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows

whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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47. Please provide an ALTERNATIVE which avoids this impact.

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* 377 - CALIFORNIA BLACK BEAR.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on California Black Bear.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

California Department of Fish and Game biologist Bruce Elliot describes the Ventana Wilderness population of Black Bears as "casual and infrequent." "These are wild bears; rare and precious and in no way comparable to the black bears in popular Sierra camping areas." "They are not problem bears relocated from Yosemite" Sierra Club Ventana Newsletter, Nov 99 "Cubs have been spotted in the area of the north coast ridge road."

Black Bears occasionally walk into non-rural areas of Monterey County including Carmel (Killed May 24, 2001), Jeffer's Forest in Pebble Beach (May 24, 2001), Laguna Seca (May 20, 2001), Salinas (May 2001), Arroyo Seco, Hunter Liggett, Salinas Airport (1962), Soledad (1964), Fort Ord, Monterey (Aguajito Rd 1986?), Jeffers Forest in Pebble Beach (2 bear cubs) in 1994, Tassajara (1997), Higgins Creek in Ventana Wilderness (1998), Fort Ord and Sand City (May 1999), Via la Gitana (East of Carmel Valley Village, Aug 99), Tassajara Rd (May 99).

"About one bear a year is killed on Cuesta Grade on Highway 101 and one bear a year is spotted making its way along the riparian corridor of the Salinas River."

"For all mammals, the acuity of the sense of smell depends primarily upon the size of the 'olfactory mucosa,' a specialized area of mucous membrane located in the nose. In humans the olfactory mucosa normally totals less than a square inch in area. In the average bear, it may be one hundred times that much. Bears have been known to detect the odor of rotting carrion from as far away as ten miles." Bears, Their Life and Behaviour, Ashworth & Wolfe, Crown, 1992

This indicates that to a bear, an offensive smell will be far less intense than to a human.

Bears hearing appears to range well up into ultrasonic frequencies. Id.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Black Bear.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 378 - CALIFORNIA BLACK BEAR HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
California Black Bear Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
California Black Bear Habitat.

1b. If no objective criteria are used please state that clearly.

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20b. If no margin of error is used please state that clearly.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 379 - MOUNTAIN LIONS (FELIS CONCOLOR).

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on Mountain Lions (felis concolor).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This is a Federally listed Threatened species. Monterey County is well within the range of this species. They often walk into Carmel Valley. They occasionally walk into non-rural areas including Hatton Canyon (1980's), Pebble Beach and Pacific Grove (late 1970's), Rio Road in Carmel Sept 99, Pescadero Canyon in Pebble Beach Sept 99, Pescadero Canyon in Pebble Beach Dec 16 1999, Ocean Ave (downtown) Carmel, 4am Dec 16 1999.

"If you have deer in your area, you probably have mountain lions."
California Department of Fish and Game (CDF&G) Wildlife Biologist Terry Palmisano, Carmel Pine Cone Oct 1 1999.

Mountain Lions occasionally come through [Pescadero Canyon] while hunting. -Pebble Beach Forester, Paul Dubsky, Carmel Pine Cone 10/1/1999

"[Pebble Beach Forester Paul] Dubsky believes that there is still habitat available for the [mountain] lions in the Del Monte Forest, which allows them to stay a safe distance from people and residences."
-Carmel Pine Cone, Dec 24, 1999 front page.

"Last month, [Carmel gallery owner Dino] Orlando spotted a [mountain] lion crossing Highway 1, 100 yards north of the Carpenter exit."
"And in recent weeks, police received yet another report of a lion, chasing a raccoon by the Serra statue in Carmel Woods."
-Carmel Pine Cone, Dec 24, 1999 front page.

The Carpenter exit and Serra statue are both immediately adjacent to the wild Pescadero Canyon in Pebble Beach.

Two Mountain Lions were seen at Carmel Middle School parking lot about 10:45 pm by an employee Mar 28, 2000. Herald Apr 1 2000, pg b2

QUANTIFICATION OF BASELINES AND IMPACTS:

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1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Mountain Lions (felis concolor).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and

losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

-

* 380 - MOUNTAIN LIONS (FELIS CONCOLOR) HABITAT.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the project's potential impacts on Mountain Lions (felis concolor) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

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1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 381 - MONTEREY DUSKY-FOOTED WOODRATS.

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Please carefully analyze and disclose the project's potential impacts on
Monterey Dusky-Footed Woodrats.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

They are a CDFG Species of Special Concern & a Federal Candidate 2.
They occur in oak woodland and savanna habitats.
They are closely tied to their nests for escape cover and thermal protection.

"Numerous midden locations were observed throughout woodland and chaparral habitats. (Thelander personal Communication)"
Rancho San Carlos FEIR pg 11-47 1995

There was at least one residence in Pescadero Canyon in Pebble Beach
Lot program EIR.

This species has been documented near the Arroyo Seco Campground.(Forest Service ltr to FHWA Aug 9 1994)

QUANTIFICATION OF BASELINES AND IMPACTS:

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Monterey Dusky-Footed Woodrats.

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* 382 - MONTEREY DUSKY-FOOTED WOODRATS HABITAT.

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Please carefully analyze and disclose the project's potential impacts on
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The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Monterey Ornate Shrews.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

Species of Special Concern & a Federal Candidate 2.
This species is known to inhabit Monterey County.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Monterey Ornate Shrews.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

* 383 - MONTEREY ORNATE SHREWS.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 384 - MONTEREY ORNATE SHREWS HABITAT.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Monterey Ornate Shrews Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Monterey Ornate Shrews Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

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45. Please provide AVOIDANCE MITIGATION for this impact.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 385 - CALIFORNIA TIGER SALAMANDER (AMBYSTOMA CALIFORIENSE).**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
California Tiger Salamander (Ambystoma Californiense).

If you claim the document contains proof of no-significant-impact for

this impact please explicitly state the page number and paragraph.

"This species inhabits grassland and oak savanna habitats in the valleys and low hills of central and coastal California. It is currently listed as a Category 1 species following a ruling by US-FWS (USFWS 1994a), which found Endangered status 'warranted but precluded' by higher priority species."

They have been located at a Salinas Valley "Rancho San Juan project" pond site in 1990 and at a site just north of that project. They are known to aestivate up to one mile from breeding sites. They were found within the alternative 4 alignment for the Prunedale Bypass according to Cal-Trans. -Rancho San Juan project ADC Specific Plan Draft Program EIR pg 5-52

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Tiger Salamander (*Ambystoma Californiense*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 386 - CALIFORNIA TIGER SALAMANDER (*AMBYSTOMA CALIFORIENSE*) HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on California Tiger Salamander (*Ambystoma Californiense*) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Tiger Salamander (*Ambystoma Californiense*) Habitat.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Gray Fox.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

About 1000 grey foxes are killed by trappers each year.
California
Department of Fish and Game.

Monterey Peninsula Habitat
"Other species likely to occur on the project site are the gray fox..."
Macomber Estates Final EIR. 1992 p 71

I carried a dead gray fox out of the roadway on Holman Highway in 2002.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Gray Fox.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

* 387 - GRAY FOX.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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46. Please provide the reverse of this impact as Mitigation.

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* 388 - GRAY FOX HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Gray Fox Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Gray Fox Habitat.

1b. If no objective criteria are used please state that clearly.

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46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 389 - WOLVERINE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Wolverine.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Resembling a short-legged bear the wolverine is actually a member of the weasel family. It weighs 35-60 pounds and measures 35-45 inches long including its tail. It is very elusive and has a home range of several hundred square miles, making it difficult to study. Human disturbance and loss of habitat threaten its existence. It is California listed as threatened." California Department of Fish and Game

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Wolverine.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 390 - WOLVERINE HABITAT.

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on
Wolverine Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Wolverine Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 391 - SOUTHERN SEA OTTER (ENHYDRA LUTRIS NEREIS).

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on
Southern Sea Otter (enhydra lutris nereis).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This species was federally protected under the Endangered Species Act as a Federally listed Threatened species in 1977. Its population numbers have dropped for 5 of the last 6 years since 1996.

It is also protected under the Marine Mammal Protection Act. The Marine Mammal Protection Act 1972, USC 16 establishes a moratorium on the taking ("harass, hunt, capture or kill") and importation of marine mammals and marine mammal products, with exceptions for scientific research, allowable incidental taking, exemptions for subsistence activities by Alaskan natives and hardship exemptions (16 U.S.C. 1371). It requires all private or public actions that intentionally take marine mammals to get a permit.

MMPA is administered by US-FWS to protect sea otters.

Monterey County is not only well within the range of this species, it contains almost the entire population. Monterey County coastal waters contain the largest concentration of the Southern Sea Otter . It lives in nearshore kelp beds out to the 100 meter depth contour and occurs from Ano Nuevo in Santa Cruz County to the north to approximately Pt. Conception in the south. There is a small (17 - 25 individuals) relocated to San Nicholas Island. It is a keystone species (Miller 98) that keeps sea urchins from depleting kelp beds. In May 99 the Sea otter population has dropped from 2377 to only 1937.

"As one of the few marine representatives of the order Carnivora, the sea otter evolved to inhabit a narrow ecological zone adapting to the near shore community and preferring a rocky shoreline with kelp beds." FWS, Draft Southern Sea Otter Recovery Plan June 1996

"Otters feed in both rocky and soft sediment nearshore areas, as well as in the kelp understory and canopy." US-Fish & Wildlife Service, "The Southern Sea Otter. Its Biology, Life Habits and History"

"Otters live in waters with temperatures between 35 and 60 degrees F." Ibid

Sea Otters use kelp beds for protection from predators including the great white shark.

Pesticide, fertilizer and non-point pollution runoff can harm the imperiled sea otter and its fragile habitat.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Southern Sea Otter (enhydra lutris nereis).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and

potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 392 - SOUTHERN SEA OTTER (ENHYDRA LUTRIS NEREIS) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Southern Sea Otter (enhydra lutris nereis) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Southern Sea Otter (enhydra lutris nereis) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

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* 393 - GOLF COURSE WATER CUTBACK.

This Alternative does not require any non-off-the shelf technology.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

*** 394 - STORMWATER CAPTURE.**

This Water supply mitigation does not require any non-off-the shelf technology.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

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COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

*** 395 - CISTERN PROGRAM.**

Cisterns are water storage tanks generally ranging in size from 50 gallons (about \$110) to 1500 gallons (about \$500 to \$750). Cisterns typically collect and store rain runoff from a single house so it can be used for domestic purposes including toilet flushing, gardening, lawns, and emergency water supplies.

This Water supply mitigation does not require any non-off-the shelf technology.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

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E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute

amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 396 - DUAL PLUMBING FOR NEW CONSTRUCTION.

This Water supply mitigation does not require any non-off-the shelf technology

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each

criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 397 - ENFORCE LANDSCAPING WATER CUTBACK RULES.

This Water supply mitigation does not require any non-off-the shelf technology.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

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D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each

measurement, calculation, and conclusion and whether it is measured or assumed.

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H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

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I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

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K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 398 - GENERAL WATER POLLUTION.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
General Water Pollution.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Worldwide at least 25,000 people die every day from their normal use of water. (WWF Atlas of Environment, 1990) (Between 5 and 12 million per year.)

"States report that about 40 percent of the waters they assessed do not meet water quality goals. About half of the nation's over 2,000 major watersheds have serious or moderate water quality problems."
-EPA Administrator, Carol Browner and Secretary, Dept. of Agriculture Dan Glickman Feb. 14th 1998 in letter to Vice President Al Gore.
The report "Clean Water Action Plan" continues "Despite tremendous progress, 40 percent of our nation's waterways assessed by states are still unsafe for fishing and swimming."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of General Water Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 399 - NON-POINT SOURCE WATER POLLUTION.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Non-Point Source Water Pollution.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Runoff washes large quantities of pollutants from rooftops, streets, and parking lots. Stormwater pollutants include nutrients, salt, oil, oxygen-consuming materials, and toxics such as copper, lead and zinc.

These contaminants come to rest on impervious surfaces by settling from the atmosphere; from car and truck operation; from fertilizers and pesticides applied to lawns; from corrosion of metal downspouts and gutters; and a host of other sources." The Cumulative Effects of Land Development on Streams, Rivers, Lakes, Tidal Waters & Wetlands, by Richard Klein 1979

The Exxon Valdez spilled 11 million gallons of crude oil into Alaska's

Prince William Sound. Bilge Cleaning and other ship operations releases more than 12 times that amount.

Used engine oil from road runoff and oil changes is 33 times that - every year. "The amount of oil from an average oil change could kill fish in a million gallons of water." Sierra Magazine Mar/Apr 1999 pg 17 citing a National Research Council report.

"[D]ue to increased motor vehicle and pedestrian traffic and parking associated with project operation, increased quantities of urban pollutants such as heavy metals from exhaust, motor oil, grease and litter would enter the Bay through the outfall as stormwater contaminants creating potential biological disturbances in the intertidal and subtidal areas. Other urban pollutants generated at the site could include pesticides and fertilizers applied to project landscaping." DEIR, Cannery Row, Rohr Hotel, 1983

Please state all materials used in rooftops, streets, and parking lots which could potentially pollute runoff water.

"Oil is composed of thousands of compounds, including polynuclear aromatic hydrocarbons, or PAHs. PAHs are not regulated in the aggregate nor for their impact on aquatic life. The EPA issues water-quality recommendations only for human consumption of specific PAHs-such as naphthalene and chrysene-although states can devise their own regulations."

"... Heinz (US-National Marine Fisheries Service biologist in Juneau) and his colleagues have determined that PAH levels as low as 1 ppb harm both pink salmon and Pacific herring. In their most recent studies which appear in this month's Environmental Toxicology and Chemistry, the scientists found that mortality increased for both species of fish exposed to 1 ppb. And they discovered that the effects of very weathered oil were the same as those of fresh oil..." Scientific American March 1999 pg 38

Hazardous waste is increasingly expensive to dispose of and in some cases is illegal to manufacture. Some unscrupulous people drive trucks in rainstorms and let the hazardous and prohibited waste leak undetected onto highways.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Non-Point Source Water Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 400 - WATER POLLUTION CAUSING WATER QUANTITY LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Water Pollution Causing Water Quantity loss.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

"Lake Tahoe's South shore has lost some 20 percent of its drinking water supply to MTBE." Associated Press April 11 1999

The water supply for Chualar, California was so polluted with nitrates water trucks were needed to supply the community with all potable water for at least 3 years.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Water Pollution Causing Water Quantity loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 401 - PUBLIC TRUST WATER QUALITY LOSS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Public Trust Water Quality Loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

For example: Acidity
"In lakes and waterways all life ceases when the pH value falls below
about 4. Many lakes in Scandinavia are already devoid of all organic
life." Earth Book Atlas 1987, pg 24 ISBN 0-87746-100-7

The mortality level for Rainbow trout (genetically identical to the ESA
listed West Coast Steelhead (*Oncorhynchus mykiss*) is a pH of 6.56.

The mortality level for Brown trout is a pH of 6.27.

The mortality level for Yellow Perch a pH of 4.43.
Janice, Harvey, Acid Rain in the East: The Problem and the Polluters
(Fredericton, New Brunswick: New Brunswick Conservation Council 1988)

Grease Traps

"State of the art oil and grease traps, if properly maintained, only

reduce pollution by 80%." Department of Fish & Game letter May 21, 1997
to City of Capitola on Capitola Crossing Project.
How many Grease Traps will be used?
What is the volume of kitchen/cooking grease generated per year?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Public Trust Water Quality Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20s. Please state whether this MARGIN of ERROR is measured or assumed.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 402 - NON-POINT SOURCE WATER POLLUTION IMPACTS ON EACH LISTED SPECIES.**

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of

Non-Point Source Water Pollution impacts on each listed species.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Non-Point Source Water Pollution impacts on each listed species.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 403 - NON-POINT SOURCE WATER POLLUTION IMPACTS ON STEELHEAD.**

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of

Non-Point Source Water Pollution impacts on Steelhead.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Non-Point Source Water Pollution impacts on Steelhead.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 404 - NON-POINT SOURCE WATER POLLUTION IMPACTS ON THE RED-LEGGED FROG.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Non-Point Source Water Pollution impacts on the Red-legged Frog.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Non-Point Source Water Pollution impacts on the Red-legged Frog.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.
 12. Please state the most extreme values which could be encountered.
 13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
 14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
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 24. Please state whether the MARGIN of ERROR is measured or assumed.
 25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
 26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 27. Please state whether the MARGIN of ERROR is measured or assumed.
 28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
 29. Please list all potential CUMULATIVE impacts related to this one.
 - 30 Please describe all potential CUMULATIVE impacts related to this one.
 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergetic impacts.
 33. Please list, describe and quantify all Construction impacts related to this one.
 34. Please list, describe and quantify all Growth impacts related to this one.
 35. Please list, describe and quantify all Indirect impacts related to this one.
 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
 37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
 38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
 39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
 40. Please state whether the margin of error is measured or assumed.
 41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
 42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
 43. Please name each EXPERT who prepared and reviewed this impact.
 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
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- * 405 - INCREASED AQUATIC GROWTH CAUSING WATER ANOXIA.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Increased aquatic growth causing water anoxia.
- If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Increased aquatic growth causing water anoxia.
 - 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
 - 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
 - 3b. Please quote the definition used.
 4. If no measurement units are used please state that clearly.
 - 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
 - 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
 6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
 7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
 8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
 9. Please state the variance's MARGINS of ERROR or confidence level.
 10. Please state whether this MARGIN of ERROR is measured or assumed.
 11. If an average is used, please state which kind of average.
 12. Please state the most extreme values which could be encountered.
 13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
 14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 406 - WATER POLLUTION CONCENTRATION DURING SUMMER AND DROUGHTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Water Pollution Concentration during Summer and Droughts.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Dissolved pollutants (as opposed to suspended pollutants) concentrate as
water flow decreases during rain free summer months and drought conditions.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Water Pollution Concentration during Summer and Droughts.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 407 - SWIMMING POOL WATER DUMPING POLLUTION.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Swimming Pool Water Dumping Pollution.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Swimming Pool Chlorine, when drained, can pollute sewer systems or groundwater. Chlorine is toxic to aquatic life and can create a sterile environment.

Chlorine was detected in Monterey at 0.2 ppm in a Del Monte Center drainage by the Urban Watch program in 2000 administered by the Monterey Bay National Marine Sanctuary.

Chlorine was detected in Pacific Grove at Lover's Point, Asilomar, Greenwood Park, at up to 2 ppm by the Urban Watch program in 2000 administered by the Monterey Bay National Marine Sanctuary.

Level of concern for Endangered Species Act listed species is -

Aquatic Invertebrates = 0.85 ppBillion
Freshwater Fish = 2.3 ppB
Estuarine Invertebrates = 1.3 ppB

Level of concern for unlisted species is -
Aquatic Invertebrates = 0.009 ppm
Freshwater Fish = .023 ppm

EPA's Office of Drinking water established an MRDL of 4 mg / Liter
as an enforceable standard.

Chlorine's odor threshold is 0.01 ppm
NIOSH sets a maximum air pollution threshold of 0.5 ppm for 15 mins maximum.
Chlorine gas at 1000 ppm is normally fatal even if only for a few moments.

Chlorine can be inexpensively tested with an DPD Octa-Slide Comparator against color standard. Accuracy is +/- 10 percent. (LaMotte Company monitoring kit)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Swimming Pool Water Dumping Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 408 - PESTICIDES IN RUNOFF.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Pesticides in Runoff.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"DDT is being preserved in soils all over California." DDT in the Salinas Valley, 1986, California Water Resources Control Board Report # 86-2-WQ.

The lower fifty (50) miles of the Salinas River (Hydro Unit # 309.100) is on the US EPA's CWA 303(d) list for Pesticide contamination exceeding TMDL limits. The pesticides come from Agriculture, Irrigated Crop production, Agriculture-storm runoff, Agriculture-irrigation tailwater, Agriculture Return flows, and non-point source pollution.

"DDT has been found in moderate to high concentrations in the Salinas River and lower Moss Landing watershed for many years." DDT in the

Salinas Valley, 1986, California Water Resources Control Board Report # 86-2-WQ.

"The 3,800 ppb measurement at the 'pump station east' [draining into the Salinas River] is the highest ever found in a shellfish by the State Mussel Watch. As DDT and its by-products are lipid soluble, the lipid-based measure of 754,000 ppb is even more noteworthy." Id.

Monterey County used over 10 million pounds of pesticides in 1995 according to the Calif. Dept. of Pesticide Regulation. Some 428 cases of pesticide poisoning were reported to public officials in Monterey County during a six year period. 50 cases of pesticide poisoning were reported in Monterey County in 1996.

"The term 'safety factor' suggests perhaps inadvertently, the notion of absolute safety (i.e. absence of risk). While there is a conceptual basis for believing in the existence of a threshold and 'absolute safety' associated with certain chemicals, in the majority of cases a firm experimental basis for this notion does not exist." US-EPA, Reference Doses: Description and use in Health Risk Assessments March 15 1993

This means that "in a majority of cases" no chemical use can be considered either "hazard of risk free" or "absolutely safe." For a majority of chemicals there is a health hazard & risk in using them.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pesticides in Runoff.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 409 - EUTROPHICATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Eutrophication.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Eutrophication is the excessive growth of aquatic plants.

Eutrophication leads to oxygen deficiency which has killed significant numbers of fin fish and shellfish in the Chesapeake Bay, Long Island

Sound, the Black Sea, the Baltic Sea, and elsewhere.

Nitrogen fixation means making nitrogen biologically consumable by plants as food. Until 1940, human commercial activities fixed almost zero nitrogen. A study in 1990 found that half of all the nitrogen ever fixed by industrial processes occurred after 1980.

Nitrogen entering the oceans is causing fertilization and eutrophication of estuaries and coastal seas: "...it represents perhaps the greatest threat to the integrity of coastal ecosystems," RACHEL'S ENVIRONMENT & HEALTH WEEKLY #557, July 31, 1997

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Eutrophication.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 410 - WATER BODY LOSS DUE TO POLLUTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Water Body Loss Due to Pollution.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Water Body Loss Due to Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 411 - OZONE SEWAGE TREATMENT.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Ozone Sewage Treatment.

Pacifica, Ca opened its \$50 million UV sewage treatment plant Sept 10, 2000 It uses no chlorine.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

* 412 - EXCESSIVE NUTRIENT LOADINGS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Excessive Nutrient Loadings.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Nitrogen and Phosphorus are the biggest overall sources of our nation's rivers impairment.

Nitrogen fixation means making nitrogen biologically consumable by plants as food. Until 1940, human commercial activities fixed almost zero nitrogen. A study in 1990 found that half of all the nitrogen ever fixed by industrial processes occurred after 1980.

Nitrogen entering the oceans is causing fertilization and eutrophication of estuaries and coastal seas: "...it represents perhaps the greatest

threat to the integrity of coastal ecosystems," RACHEL'S ENVIRONMENT & HEALTH WEEKLY #557, July 31, 1997

"Excessive Nutrient loadings will result in excessive growth of macrophytes or phytoplankton and potentially harmful algal blooms (HAB), leading to oxygen declines, imbalance of aquatic species, public health risks, and a general decline of the aquatic resource." -EPA Administrator, Carol Browner and Secretary, Dept of Agriculture Dan Glickman Feb 14th 1998 in Report called the "Clean Water Action Plan" to Vice President Al Gore.

The lower fifty (50) miles of the Salinas River (Hydro Unit # 309.100) is in the US EPA's CWA 303(d) list for Nutrient contamination exceeding TMDL limits.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Excessive Nutrient Loadings.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 413 - NITRITE (NOT NITRATE) CONTAMINATION OF DRINKING WATER.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Nitrite (not Nitrate) Contamination of Drinking Water.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Oregon State University researchers "have named the nitrogen based compounds found in fertilizers as likely suspects in the rapid decline of at least one frog species in the Pacific Northwest."

The maximum recommended nitrite limit for drinking water, 1 milligram per liter, was sufficient to kill well over half of the Oregon spotted frog tadpoles and about half of the northwestern salamander tadpoles.

Nitrate compounds can be readily converted to nitrites through a number of environmental processes including bacteria.

Nitrogen fixation means making nitrogen biologically consumable by plants as food. Until 1940, human commercial activities fixed almost zero nitrogen. A study in 1990 found that half of all the nitrogen ever

fixed by industrial processes occurred after 1980.

Nitrogen entering the oceans is causing fertilization and eutrophication of estuaries and coastal seas: "...it represents perhaps the greatest threat to the integrity of coastal ecosystems," RACHEL'S ENVIRONMENT & HEALTH WEEKLY #557, July 31, 1997

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Nitrite (not Nitrate) Contamination of Drinking Water.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criterion and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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* 414 - NITRATE CONTAMINATION OF SURFACE WATER.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Nitrate Contamination of Surface Water.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Excessive Nitrate levels can cause abundant algal growths and can threaten human health at a concentration of 10 mg/l N or greater.

-Richard D. Klein, Protecting the Aquatic Environment from the Effects of Golf Courses. Oct 1993

Nitrogen fixation means making nitrogen biologically consumable by plants as food. Until 1940, human commercial activities fixed almost zero nitrogen. A study in 1990 found that half of all the nitrogen ever fixed by industrial processes occurred after 1980.

Nitrogen entering the oceans is causing fertilization and eutrophication of estuaries and coastal seas: "...it represents perhaps the greatest threat to the integrity of coastal ecosystems," RACHEL'S ENVIRONMENT & HEALTH WEEKLY #557, July 31, 1997

The lower fifty (50) miles of the Salinas River (Hydro Unit # 309.100) is in the US EPA's CWA 303(d) list for Nutrient contamination exceeding TMDL limits.

QUANTIFICATION OF BASELINES AND IMPACTS:

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* 415 - AMMONIA CONTAMINATION OF SURFACE WATER.

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Please carefully analyze and disclose the potential impacts of
Ammonia Contamination of Surface Water.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

"Ammonia is extremely toxic to aquatic life. Generally ammonia will pose the greatest threat to aquatic life when transported by stormwater to surface waterways." -Richard D. Klein, Protecting the Aquatic Environment from the Effects of Golf Courses. Oct 1993

Labware Direct (1 800 356 0783) sells Ammonia detection systems measuring concentrations as low as 0.01 ppm.

QUANTIFICATION OF BASELINES AND IMPACTS:

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Ammonia Contamination of Surface Water.

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3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 416 - NITRATE CONTAMINATION OF GROUND WATER.

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Please carefully analyze and disclose the potential impacts of
Nitrate Contamination of Ground Water.

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this impact please explicitly state the page number and paragraph.

Fertilizer Nitrates are polluting groundwater aquifers.

In a EPA survey reported in the July 29 1991 US News and World Report
nitrate showed up in more than half the drinking water wells tested
across the country.

"A 1984 survey carried out by the US-EPA showed that, out of 124,000
wells sampled, 24,000 had elevated levels of nitrates and 8,000 were

polluted above natural health limits." WWF, 1990

It can take decades for nitrates to percolate down into groundwater,
so the problem will worsen as the increased amounts of fertilizer
applied today reaches groundwater.

Nitrogen fixation means making nitrogen biologically consumable by
plants as food. Until 1940, human commercial activities fixed almost
zero nitrogen. A study in 1990 found that half of all the nitrogen ever
fixed by industrial processes occurred after 1980.

Nitrogen entering the oceans is causing fertilization and eutrophication
of estuaries and coastal seas: "...it represents perhaps the greatest
threat to the integrity of coastal ecosystems," RACHEL'S ENVIRONMENT
& HEALTH WEEKLY #557, July 31, 1997

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criteria.

3b. Please quote the definition used.

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* 417 - PHOSPHORUS CONTAMINATION OF SURFACE WATER.

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Please carefully analyze and disclose the potential impacts of
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If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 419 - PHOSPHORUS CONTAMINATION OF DRINKING WATER.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Phosphorus Contamination of Drinking Water.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Phosphorus Contamination of Drinking Water.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 420 - ALUMINUM SULFATE.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Aluminum Sulfate.

Aluminum Sulfate is sometimes added to surface waters to reduce Phosphorus pollution and prevent algae growth.

* 421 - PESTICIDES IN SURFACE WATER.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Pesticides in Surface Water.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The 1998 U.S. National Water Quality Assessment (NWQA) Program found pesticide contamination in all of its river and stream samples. "Fatal Harvest" pg 232

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pesticides in Surface Water.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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12. Please state the most extreme values which could be encountered.

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- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
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31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
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46. Please provide the reverse of this impact as Mitigation.
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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
- * 422 - PESTICIDES IN GROUNDWATER.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Pesticides in Groundwater.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Some pesticides readily infiltrate soils, particularly sandy soils, and eventually acculate in the groundwater. In 1989, the [US] EPA detected pesticides in the groundwater of twenty-six states."
Environmental Science; Morgan, Moran & Weirsma; W.C. Brown Pub. 1993 p 179

"The U.S. spends \$1,300,000,000.00 annually to monitor groundwater for pesticides." Ibid

Once contaminated groundwater is extremely difficult to clean up.
"Groundwater Contamination in the U.S.", R. Patrick et al 1987, U of Pennsylvania

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
- Pesticides in Groundwater.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
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- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
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12. Please state the most extreme values which could be encountered.
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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
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16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 423 - TRICHLOROETHYLENE IN DRINKING WATER (TCE).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Trichloroethylene in Drinking Water (TCE).

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

On April 13th 1999, Monterey County Board of Supervisors voted unanimously for an emergency ban on new water wells for the Northern Fort Ord area near Marina because of the Trichloroethylene pollution.

Federal and California water standards mandate no more than 15 ppBillion.

The US Public Health Service estimated that "between 9 and 34% of water supply sources in the US may be contaminated with Trichloroethylene."
Trichloroethylene in Drinking Water causes myelocytic leukemia.
Trichloroethylene is used to degrease metal parts.
Symptoms include; dizziness, nausea, vomiting, fatigue, skin rashes and cardiac arrhythmia. It impairs short term memory, attention span and ability to think sequentially. It causes permanent neurological deficit after a single exposure.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Trichloroethylene in Drinking Water (TCE).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

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* 424 - ORGANOPHOSPHORUS PESTICIDE COMPOUNDS IN DRINKING WATER.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Organophosphorus Pesticide Compounds in Drinking Water.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Organophosphorus pesticide compounds include Diazinon and Malathion and are nerve agents originally developed in Nazi Germany in the 1930s.
Because Organophosphorus pesticides are now widely used on food crops they were the first family of compounds to be evaluated under the 1996 FQPA.

According to Mark Miller, M.D. MPH a member of the Environmental Health Committee of the American Academy of Pediatrics (quoted in Coast Weekly April 22 1999) - even low level exposure to Organophosphorus pesticide compounds (e.g. diazinon, cypermethrin, Chlorpyrifos, hydramethlynon, propetamphos and Malathion) may cause symptoms. "The effects of organophosphates are cumulative so that if the chemical used in the home and in food is added to those used on school grounds, something may tip the bucket."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Organophosphorus Pesticide Compounds in Drinking Water.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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16. Please quantify the length of time this impact would last.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 425 - WATER POLLUTION-BASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Water Pollution-Base.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Water Pollution-Base.

1b. If no objective criteria are used please state that clearly.

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3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 426 - WATER POLLUTION-ACIDITY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Water Pollution-Acidity.

If you claim the document contains proof of no-significant-
impact for
this impact please explicitly state the page number and
paragraph.

When water becomes too acidic it interferes with fish and
aquatic life.

"In lakes and waterways all life ceases when the pH value
falls below
about 4. Many lakes in Scandinavia are already devoid of all
organic
life." Earth Book Atlas 1987, pg 24 ISBN 0-87746-100-7

The mortality level for Rainbow trout (genetically identical to
the ESA
listed West Coast Steelhead (*Oncorhynchus mykiss*) is a pH of 6.56.
The mortality level for Brown trout is a pH of 6.27.
The mortality level for Yellow Perch a pH of 4.43.
Janice, Harvey, Acid Rain in the East: The Problem and the
Polluters
(Fredericton, New Brunswick: New Brunswick Conservation
Council 1988)

Water pH can be changed by and are an indication to look
for sewer
overflows, pesticides, fertilizers, dust in the air, and mineral
substances.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the
objective
(non-subjective) CRITERIA used to determine the impact
significance of
Water Pollution-Acidity.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe
how the threshold of significance chosen is scientifically
testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS
(numbers) used to determine the significance for EACH
criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to
determine the significance for each criteria.

5b. If no method of measurement was used please state that
clearly for each criteria and explain thoroughly how the data
was obtained.

6. Please quantify the existing or current BASELINE
measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level
and whether the MARGIN of ERROR is measured or
assumed.

8. Please state the VARIANCE or fluctuation, assumed or
expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or
confidence level.

10. Please state whether this MARGIN of ERROR is
measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be
encountered.

13. Please describe and quantify which criteria and
ASSUMPTIONS the Impact Significance predictions are
most SENSITIVE.

14. Please analyze and quantify how sensitive those
predictions are to reasonably foreseeable varying criteria and
assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time
period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the
impact changes from significant to less-than-significant and
the clear criteria and rationale for that
number.

19. Please provide the MARGIN of ERROR used (in percent
and absolute amount) for measuring the Significance
THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is
measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the
impact changes from LEGAL to ILLEGAL for ALL related and
potentially relevant local, state and federal
laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP
with increasing input, other impacts have complex non-linear
relationships. Please provide a graph that shows
whether the relationship is linear or otherwise - when at and
near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM
CHANGE, to which the IMPACT could raise or lower the
baseline number and its MARGIN of ERROR or confidence
levels.

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related to this one.

32. Please list, describe and quantify all potential compound
and synergetic impacts.

33. Please list, describe and quantify all Construction
impacts related to this one.

34. Please list, describe and quantify all Growth impacts
related to this one.

35. Please list, describe and quantify all Indirect impacts
related to this one.

36. Please list and quantify every OTHER IMPACT - this
impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the
RESOURCE this impact affects.

38. Please state the METHOD of measurement used to
determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence
level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or
assumed.

41. Please quantify what is the maximum amount (in
AMOUNT of existing) of this resource that can be lost and
still be restored.

42. Please quantify what is the MAXIMUM amount (in
PERCENTAGE of existing) of this resource that can be
LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed
this impact.

44. Please cite each expert's training, and peer reviewed,
validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this
impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this
impact.

48. Please list all other studies initiated by the applicant
related to this impact, including subject matter breadth,
author's names and dates and where they
can be examined.

* 427 - WATER POLLUTION-CHLORDANE.

The Document appears to have ignored this potentially
significant Impact.
Please carefully analyze and disclose the potential impacts
of
Water Pollution-Chlordane.

If you claim the document contains proof of no-significant-
impact for
this impact please explicitly state the page number and
paragraph.

In 1996 2,193 fish consumption advisories were issued in 48
states.
Mercury, PCBs, chlordane, dioxin and DDT were responsible
for almost all
fish consumption advisories in 1996. -EPA Administrator,
Carol Browner
and Secretary, Dept of Agriculture Dan Glickman Feb 14th
1998 in Report

called the "Clean Water Action Plan" to Vice President Al Gore.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Water Pollution-Chlordane.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 428 - WATER POLLUTION-DDT.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of Water Pollution-DDT.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Recently the US-EPA found DDT in 99% of the freshwater fish it tested."
(Living in the Environment, 1998, pg 625)

In 1996 2,193 fish consumption advisories were issued in 48 states.
Mercury, PCBs, chlordane, dioxin and DDT were responsible for almost all fish consumption advisories in 1996. -EPA Administrator, Carol Browner and Secretary, Dept of Agriculture Dan Glickman Feb 14th 1998 in Report called the "Clean Water Action Plan" to Vice President Al Gore.
Up to 15% of a pesticide can be DDT which is still allowed by EPA and FIFRA as an "impurity" in insecticides including chlorobenilate and dicofol. (Living in the Environment pg 627)

Some 1 billion kilograms of DDT were spread into the natural environment prior to 1972.

"DDT is being preserved in soils all over California." DDT in the Salinas Valley, 1986, California Water Resources Control Board Report # 86-2-WQ.

The lower fifty (50) miles of the Salinas River (Hydro Unit # 309.100) is on the US EPA's CWA 303(d) list for Pesticide contamination exceeding TMDL limits. The pesticides come from Agriculture, Irrigated Crop production, Agriculture-storm runoff, Agriculture-irrigation tailwater, Agriculture Return flows, and non-point source pollution.

"DDT has been found in moderate to high concentrations in the Salinas

River and lower Moss Landing watershed for many years." DDT in the Salinas Valley, 1986, California Water Resources Control Board Report # 86-2-WQ.

DDT is a chlorinated hydrocarbon. Above 1000 ppm a chlorinated hydrocarbon fluid is a hazardous waste (EPA 40 CFR 261 regs)

Labware Direct (1 800 356 0783) sells chlorinated hydrocarbon detection systems measuring concentrations as low as 200 ppm.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Water Pollution-DDT.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 429 - WATER POLLUTION-THE OTHER TOP 20 HAZARDOUS SUBSTANCES.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Water Pollution-the Other Top 20 Hazardous Substances.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

From ATSDR - ATSDR/EPA Top 20 Hazardous Substances 1995
Agency for Toxic Substances and Disease Registry
This annual evaluation activity fulfills the conditions of CERCLA section 104 (i), as amended, which requires ATSDR and EPA to revise the priority list of hazardous substances (N=275) periodically to include additional hazardous substances.

Each chemical is identified with a Rank Number and includes an ATSDR Public Health Statement.

The Public Health Statements were prepared by the ATSDR Division of Toxicology. They provide general information on the properties of the chemical and answer many health concerns that are voiced by community groups. A full list of the ATSDR Toxicologic Profiles and Public Health Statements can be accessed through the ATSDR HazDat.

The full priority list of hazardous substances (N=275) for 1995 can be accessed HERE!

Top 20 Hazardous Substances:

Lead Arsenic
Mercury, Metallic Vinyl Chloride
Benzene Polychlorinated Biphenyls (PCBs)

Cadmium Benzo(a)pyrene
 Chloroform Benzo(b)fluoranthene
 DDT,P'P'- Aroclor 1260
 Trichloroethylene Aroclor 1254
 Chromium(+6) Chlordane
 Dibenzo[a,h]anthracene Hexachlorobutadiene
 DDD,P'P'- Dieldrin

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Water Pollution-the Other Top 20 Hazardous Substances.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 430 - WATER POLLUTION-OIL IN GENERAL.

The Document appears to have ignored this potentially significant Impact.
 Please carefully analyze and disclose the potential impacts of Water Pollution-Oil in General.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Human activity puts ten times as much oil in the oceans as comes from natural seeps." Beytrayal of Science and Reason, Erlich, 1996

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Water Pollution-Oil in General.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 431 - LAND BASED OIL LEAKAGE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Land Based Oil Leakage.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Since the Exxon Valdez spill, at least 10,000 spills have occurred in

the United States, dumping 15 to 20 million gallons of oil. Victims are tens of thousands of birds, mollusks, aquatic vegetation, as well as salt marshes, swamps, and coastal ecosystems. Oil spills occur on land when pipelines leak or break. Oil is difficult to remove from soil, and it leaches into nearby creeks and lakes. Oil contaminated water is unfit for use." Audubon's 1994 Almanac on the Environment

The town of Avila Beach California was essentially abandoned due to millions of gallons of oil leaking into the groundwater aquifer over many decades.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Land Based Oil Leakage.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 432 - LAND BASED OIL SPILLS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Land Based Oil Spills.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"A tanker truck plunged off a mountain road, killing the driver and spewing as much as 4,000 gallons of crude oil into a Ventura County creek ." Monterey Herald March 1, 2000

"A tanker truck carrying 7,500 gallons of diesel fuel overturned Wednesday near Chualar, spilling 1,800 gallons onto the highway and shoulder and slowing southbound traffic for hours." Herald B2, Jun 1,00

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Land Based Oil Spills.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 433 - USED ENGINE OIL FROM ROAD RUNOFF AND OIL CHANGES.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Used Engine Oil from Road Runoff and Oil Changes.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

The Exxon Valdez spilled 11 million gallons of crude oil into Alaska's Prince William Sound. Used engine oil from road runoff and oil changes is 33 times that - every year. "The amount of oil from an average oil change could kill fish in a million gallons of water." Sierra Magazine Mar/Apr 1999 pg 17 citing a National Research Council report.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Used Engine Oil from Road Runoff and Oil Changes.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 434 - OIL IN ASPHALT PAVEMENT CAUSING WATER AND AIR POLLUTION.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of

Oil in Asphalt Pavement Causing Water and Air Pollution.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Oil from asphalt pavement causes continuous long term air and water pollution. This is distinct from the air and water pollution caused by construction or paving. (Pavement vs Paving)

Crude oil is the second largest component of asphalt, composing at least 5 percent and up to 7 percent of the mass of the pavement (*1). Thus every ton of new paving asphalt contains at least 100 pounds, and possibly 140 pounds, of crude oil. Since the oil is not sealed in, it evaporates and becomes air pollution, or it is washed off in rains and fog to become water pollution. Even in relatively tiny amounts, these forms of oil (hydrocarbon) water and air pollution can sicken and kill

plants and animals.

"Oil is composed of thousands of compounds, including polynuclear aromatic hydrocarbons, or PAHs. PAHs are not regulated in the aggregate nor for their impact on aquatic life. The EPA issues water-quality recommendations only for human consumption of specific PAHs-such as naphthene and chrysene-although states can devise their own regulations."

"... Heinz (US-National Marine Fisheries Service biologist in Juneau) and his colleagues have determined that PAH levels as low as 1 ppb harm both pink salmon and Pacific herring. In their most recent studies which appear in this month's Environmental Toxicology and Chemistry, the scientists found that mortality increased for both species of fish exposed to 1 ppb. And they discovered that the effects of very weathered oil were the same as those of fresh oil..." Scientific American March 1999 pg 38

The hydrocarbons in asphalt can cause direct harm to many species of aquatic and terrestrial life including killing salmonid eggs and alevins. See *2, *3.

Asphalt hydrocarbons could potentially be a hazardous waste under California's Hazardous Waste regulations as the threshold is an LC50 of 500 mg/liter. California Department of Fish and Game found significant mortality (up to 60%) at only 1000 mg/liter after only 96 hours. No margin of error was determined. See *3.

It is possible that asphalt's toxin release could increase to cause the LC50 to drop under 500 mg/liter with small variances in testing duration, asphalt age, sunlight exposure, stream temperature, stream water flow, stream acidity, and surface area of asphalt exposed to the surface water. See *3.

California Fish & Game Code 5650 Prohibits Polluting waters with any substance or material deleterious to fish, plant life, or bird life. Prohibits placement of any petroleum product into a place where the product can pass into the waters of the state.

The US blacktops some 1.3 million acres every year. This is equal in area to the state of Delaware. (David Pimental, panelist, "Carrying Capacity Network" conference, Washington DC, 1993)

According to the California Integrated Waste Management Board one lane mile 4 inches thick of conventional asphalt concrete needs 1,584 tons of material. The components include about 3 million pounds of crushed rock and 175 thousand pounds of asphalt cement.

1) Please identify the total number of lane miles the project will create or maintain both directly and indirectly.

1a) Please identify the total number of acres (include parking lots) of asphalt the project will create both directly and indirectly.

2) Please identify the percentage of oil, by mass, the asphalt will contain.

3) Please identify the number of tons of asphalt used per lane-mile for the project.

3a) Please identify the number of tons of asphalt used per acre.

4) Please identify the total amount of asphalt (in tons) the project will require.

5) Please identify the total mass amount of oil contained in the asphalt proposed for all paving related to the project including for all mitigations.

6) Please analyze the amount and form of oil that will evaporate and become air pollution per year - and for the cumulative lifespan of the asphalt.

7) Please analyze the amount and form of oil that will evaporate hourly and become air pollution during typical hot summer days.

8) Please analyze the amount and form of oil that will runoff and become water pollution per year for the cumulative lifespan of the asphalt.

9) Please analyze the yearly environmental impacts due to the oil's evaporation - and for the cumulative lifespan of the asphalt.

10) Please analyze the yearly environmental impacts due to the oil's runoff into surface waters - and for the lifespan of the asphalt.

11) Please analyze the runoff oil's impacts (and cumulative impacts) on the rare and endangered species - especially reproductive harm to fish, amphibians, birds, trees and plants.

12) Please analyze the runoff oil's impacts when combined with pesticides on the rare and endangered species - especially the fish, amphibians, birds, trees and plants.

13) Please analyze using concrete to mitigate the impacts of the asphalt.

*1 California Integrated Waste Management Board - Asphalt Pavement Recycling Fact Sheet. Confirmed by call to Engineer at Granite Rock of Watsonville, CA Feb 25 1998.

*2 Harrington, JM and JT King. 1996. Toxicity of reclaimed asphalt pavement with particular emphasis on its use in or near irrigation canal systems. Environmental Services Division Administrative Report #96-2

*3 King, JT, JM Harrington, and KR Wagter. 1996. The toxicity of milled asphalt pavement to aquatic organisms and its effects on stream

substrates in Deep Creek, San Bernardino County.
Environmental Services
Division Administrative Report #96-3

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Oil in Asphalt Pavement Causing Water and Air Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 435 - RUBBERIZED ASPHALT CONCRETE.

The Document appears to have ignored this potentially feasible Alternative.

Please carefully analyze and disclose the potential benefits of Rubberized Asphalt Concrete.

Rubberized Asphalt Concrete has greater strength and durability than conventional asphalt concrete even when only applied half as thick.

According to the California Integrated Waste Management Board one lane mile 4 inches thick of Rubberized asphalt concrete needs only 7,504 tons of material. The components include about 1.4 million pounds of crushed rock, 100 thousand pounds of asphalt cement and 25 thousand pounds of crumb rubber from shredded tires.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.	L1. It is important to know the cost to benefit ratio, please explain that ratio.	E2. Please state the extreme conditions which will be encountered.
D. Please state the existing or current baseline measurement (level) for each criteria.	M. EXPERT QUALIFICATIONS Please name each expert who prepared and reviewed this Alternative analysis.	F. Please provide a graph of historical measurement.
E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.	M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.	G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.
E1. If an average is used, please state which kind of average.	-	H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.
E2. Please state the extreme conditions which will be encountered.	* 436 - CONCRETE ROADWAYS.	H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.
F. Please provide a graph of historical measurement.	The Document appears to have ignored this potentially feasible Alternative. Please carefully analyze and disclose the potential benefits of Concrete Roadways.	H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;
G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.	Concrete as hard surface does not contain or release oil pollution, but it still increases the impervious surface area.	H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.
H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.	This Alternative does not require any non-off-the shelf technology.	I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.
H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.	ALTERNATIVE FACTUAL ANALYSIS There is little or no factual evidence in the document showing why this alternative is infeasible.	I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.
H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;	A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.	I2. If no margin of error is used please state that clearly.
H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.	A1. If no objective criteria are used please state that clearly.	J. ALTERNATIVE VALUE PROOF Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.
I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.	A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.	J1. Please discuss the limitations of those studies.
I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.	B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.	BENEFIT DURATION K. Please clearly describe how the benefits vary over the time during the studies.
I2. If no margin of error is used please state that clearly.	B1. If no measurement units are used please state that clearly.	K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.
J. ALTERNATIVE VALUE PROOF Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.	C. Please state the method of measurement used to determine the value for each criteria.	COSTS L. Please cite the costs for the Alternatives studied.
J1. Please discuss the limitations of those studies.	C1. If no measurement units are used please state that clearly for each criteria.	L1. It is important to know the cost to benefit ratio, please explain that ratio.
BENEFIT DURATION K. Please clearly describe how the benefits vary over the time during the studies.	C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.	M. EXPERT QUALIFICATIONS Please name each expert who prepared and reviewed this Alternative analysis.
K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.	D. Please state the existing or current baseline measurement (level) for each criteria.	M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.
COSTS L. Please cite the costs for the Alternatives studied.	E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.	-
	E1. If an average is used, please state which kind of average.	* 437 - DIRT ROADWAY.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Dirt Roadway.

Dirt Roadways do not contain petroleum containing asphalts and thus do not contaminate strewwams with oils.
Dirt Roadways do not crack and heave as do asphalt roads.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

* 438 - CHEMICAL SPILLS FROM TRUCKS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Chemical Spills from Trucks.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"A tanker truck plunged off a mountain road, killing the driver and spewing as much as 4,000 gallons of crude oil into a Ventura County creek ." Monterey Herald March 1 2000

This kind of spill can just as easily happen to trucks carrying hazardous chemicals.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Chemical Spills from Trucks.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 439 - CHEMICAL ACCIDENTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Chemical Accidents.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Chemical accidents with severe environmental and human impacts occur regularly - an average of 20 times per day - in the US."
"At least 41 million Americans live in a zip code that contains manufacturing companies whose vulnerable zone - the geographic area affected by the worst possible accident at the facility - extends more than three miles from the site."
California is among the top ten states for worst-case accident disaster potential.
National Environmental Law Center Report Spring 1999

"No complete record exists of chemical accidents, but the EPA's
Emergency Response Notification System logged almost 40,000 accident reports in 1994, or more than 100 calls each day. Some 1,000 of these reports involved deaths or injuries. Many accidents contaminate water or land. An estimated 15 U.S. accidents in the 1980s exceeded in volume and toxicity the Methyl Isocyanate chemicals released from Union Carbide at Bhopal, India, in the world's worst chemical accident, which killed 4,007 people immediately and injured some 200,000."

"Du Pont stores immense amounts of chemicals - reaching millions of pounds. By comparison, in 1988, a release of just 30,000 pounds of hydrofluoric acid from Marathon Oil in Texas City, Texas, defoliated trees, caused evacuation, and lead 1,000 people to seek medial help.
Only luck saved Texas City from a larger release. In 1993, just 8,000 pounds of sulfur trioxide from General Chemical in Richmond, Calif., sent a 15-mile ground level plume through the community and caused some 20,000 concerned people to contact local hospitals."

"The analysis of Du Pont's hazards addresses three chemicals commonly associated with chemical accidents - chlorine, ammonia, and hydrofluoric acid - at ten facilities."

The following are available upon request or from <http://www.rtk.net/wcs>.

- 1) Accidental Release Vulnerability Zones for Ten Du Pont Facilities
- 2) Top 50 U.S. Manufacturing Facilities in Worst-case Disaster Potential
- 3) Chemical Hazards and Danger Levels for Three Common Chemicals
- 4) Fact Sheet: Ten Reasons for a National, Public Data System for Risk Management Plans
- 5) Open Letter: 150 Organizations Support Right-to-Know
- 6) Fact Sheet: Seven Federal Databases Track Chemical Accidents

RACHEL'S ENVIRONMENT & HEALTH WEEKLY #557, July 31, 1997

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Chemical Accidents.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 440 - COLIFORM BACTERIA.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Coliform Bacteria.
- If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
- While Coliform bacteria (Enterotoxigenic E coli O157) can be a pathogen on its own, normally it is used as an indicator of contamination by untreated feces of humans or other animals since it is normally present in intestinal tracts of humans and animals.
- In 1994-1995 over 24 million (24,719,235) Americans were supplied with tap water that failed to meet basic health standards. Some 12,246 water delivery systems reported violations of federal Chronic Coliform Bacteria standards.
- The National Technical Advisory Committee on Water Quality Criteria set a bacteriological limit for primary water contact recreation waters during which ingestion occurs: Swimming, surfing and wading.
The limit set is in terms of fecal coliforms. In a minimum of 5 samples
- in 30 days, the fecal coliforms shall not exceed a logarithmic mean of 200/100 ml (for recreational waters), nor shall more than 10 percent of those total samples in 30 days exceed 400/100 ml. (Environmental Protection, McGraw-Hill, 1979)
- In 1993 four people died and 700 were sickened in Washington state after eating at Jack in the Box restaurants.
In Sept. 99 two people died and 600 were sickened by E. Coli in New York state while attending a county fair; also in Sept. 99 in Petersburg Illinois 18 people were hospitalized of a total of 140 people sickened with E. Coli after partying in a cow pasture.
- In 2000 in Walkerton Ontario five people died from an E. Coli outbreak in the drinking water system. More are expected to die. Up to 56 people per day were visiting hospitals complaining of e. coli symptoms.
AP May 29, 00
- Monterey County Health Dept Director Melton said "most Californians realize the shouldn't drink from any surface water in rivers or lakes because of widespread contamination by Salmonella, E-coli bacteria (from leaking septic tanks) and the parasite called Giardia, which comes from the droppings of coyotes, foxes, marmots and beavers."
-Carmel Pine Cone Sept 19 1997
- Cal-Am measured three times the allowed number of exceedances of Coliform Bacteria in 1998 (1.75 measured v. 0.5 allowed).
- What coliform standards and limits are used to determine this impact?
- Moss Landing's water supply had health risking levels of coliform in Sept 2000.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Coliform Bacteria.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 441 - WATER BORNE HEPATITIS & POLIO VIRUSES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Water Borne Hepatitis & Polio Viruses.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The Southern California Coastal Water Research Project states in January 1999 that "measurements for viruses found in the human digestive system have been taken, primarily at storm drain sites, along a 300 mile stretch of the California Coastline. Those viruses have been detected more than 50 percent of the time after heavy rains and are even detected in summer when only a trickle of water is coming through the storm drain."

During every Carmel River flood in the 1990's Monterey County Dept. of Environmental Health has issued a "No-Contact" warning due to excessive nitrate contamination of the river due to Carmel Valley septic systems.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Water Borne Hepatitis & Polio Viruses.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 442 - ALGAL BLOOMS INCLUDING PFISTERIA.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Algal Blooms including Pfisteria.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Excessive Nutrient loadings will result in excessive growth of macrophytes or phytoplankton and potentially harmful algal blooms (HAB), leading to oxygen declines, imbalance of aquatic species, public health risks, and a general decline of the aquatic resource." -EPA Administrator, Carol Browner and Secretary, Dept of Agriculture Dan Glickman Feb 14th 1998 in Report called the "Clean Water Action Plan" to Vice President Al Gore.

"Nitrogen-fed algae blooms have been identified as the source of a major outbreak of cholera in South America in 1991. The algae harbor the cholera-causing bacterium. In 1991, 500,000 people fell ill and 5000 died when cholera erupted along the coastline of Peru and quickly spread to 18 other countries.[8]"

"The nitrogen content of the Mississippi River has more than doubled

since 1965, and nitrate concentrations in the major rivers of the northeastern U.S. have increased 3-to 10-fold since 1900, according to the ESA report. The same is true of European rivers. Nitrogen from rivers is now reaching the Atlantic Ocean at rates 2 to 20 times as great as during pre-industrial times. Around the North Sea, the increase has been 6-to 20-fold."

Nitrogen fixation means making nitrogen biologically consumable by plants as food. Until 1940, human commercial activities fixed almost zero nitrogen. A study in 1990 found that half of all the nitrogen ever fixed by industrial processes occurred after 1980.

Nitrogen entering the oceans is causing fertilization and eutrophication of estuaries and coastal seas: "...it represents perhaps the greatest threat to the integrity of coastal ecosystems,"

"Nitrogen entering the oceans is causing fertilization and eutrophication of estuaries and coastal seas: '...it represents perhaps the greatest threat to the integrity of coastal ecosystems,' says the ESA report. Eutrophication is the excessive growth of plants, leading to oxygen deficiency which has killed significant numbers of fin fish and shellfish in the Chesapeake Bay, Long Island Sound, the Black Sea, the Baltic Sea, and elsewhere." RACHEL'S ENVIRONMENT & HEALTH WEEKLY #557, July 31, 1997

"Mystery Poison found in Carmel River"
"Health Dept warns that children, pets should stay away."
-Carmel Pine Cone Headlines Sept 19 1997
At least three dogs died from Oct 1996 to September 1997 immediately after drinking from the standing pools in the Carmel River. One attending veterinarian suspected a blue-green algae (also known as cyanobacteria), but there was no investigation. "I've been here 35 years and never seen anything like this before." said Carmel Valley veterinarian Gerald Petkus. County Health Dept Director Melton said two other dogs died after drinking water in 1996. No water samples were taken. According to Melton the algae is "very toxic to any animal" (this presumably includes humans).

Overpumping the Carmel River increases this risk.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Algal Blooms including Pfisteria.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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33. Please list, describe and quantify all Construction impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 443 - OTHER WATER BORNE PATHOGENS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Other Water Borne Pathogens.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Monterey County Health Dept Director Melton said "most Californian's realize the shouldn't drink from any surface water in rivers or lakes because of widespread contamination by Salmonella, E-coli bacteria (from leaking septic tanks) and the parasite called Giardia, which comes from the droppings of coyotes, foxes, marmots and beavers."
-Carmel Pine Cone Sept 19 1997

Overpumping the Carmel River increases this risk.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Other Water Borne Pathogens.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 444 - WATER CONTACT BACTERIA.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Water Contact Bacteria.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Coastal states report unhealthy levels of pollution related bacteria at swimming beaches. There were more than 2,500 beach closings in 1996.

"In 1990 Monterey County had more beach closures than the entire state of New Jersey and in the late 1980's Lover's Point and the Cannery Row area of Pacific Grove were among the worst offenders." Herald Oct 27 1999 FP

On October 11, 1999 Monterey County Environmental Health Dept. found enterococcus bacteria at Ocean Ave in Carmel at levels three times higher than state safety standards. In August 1999 they found a similar problem at Stillwater Cove in Pebble Beach. Contact with that bacteria can lead to several gastrointestinal illnesses.

The County delayed a week before posting warning signs on Carmel beach.
-Herald Oct 22 99

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Water Contact Bacteria.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 445 - SEWAGE SPILLS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Sewage Spills.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Contact with water contaminated with sewage can cause gastroenteritis
hepatitis, typhoid, polio, diarrhea, and ear infections.

"Health officials warned that contact with contaminated water can cause gastroenteritis as well as hepatitis, typhoid and polio."
Herald Mar 23
2000

CALIFORNIA
"In 1998, beaches statewide were closed for a combined total of 3,273 days, compared to 745 days in 1991, according to the most recent data available from the Natural Resources Defense Council. Sewage spills and urban runoff caused the majority of the closures." AP May 28, 2000

PEBBLE BEACH
Monterey County Health Dept closed the Spanish Bay beach "for a few days to a week" beginning on March 22 2000 because of a sewage spill from a broken sewer main. Herald Mar 23 2000

"Contamination shuts Stillwater Cove" headline Herald Apr 6 2000 "High levels of fecal coliform have been found...coming from a storm sewer that drains the famous Pebble Beach Golf Links, said Walter Wong, the county's director of Environmental Health."

CARMEL
"About 1,000 gallons of sewage spilled into Mission Trail Park in Carmel early Thursday evening." From the park it flowed into nearby Mission Trail creek, than about half a mile down to the Carmel River and into

the Carmel River Lagoon and the Carmel Bay. "Emergency crews flushed the spill area with bleach and about 1000 gallons of water." Herald, Mar 24, 2000

CHLORINE
Chlorine bleach is the standard application after a spill. Chlorine is extremely toxic and reactive itself.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Sewage Spills.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
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46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 446 - SEWAGE RUNOFF.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Sewage Runoff.
- If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
- The Carmel Area Wastewater District was given multiple stop orders in the 1990's for allowing sewage overflow into the Carmel River.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Sewage Runoff.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
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* 447 - STANDING RIVER WATER.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Standing River Water.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Excessive pumping from the Carmel River reduces river flows - especially

during late summer in California.

Low river flows cause standing water pools.
Standing water pools cause toxic blue-green algae blooms.
"Mystery poison found in Carmel River"
"Health Dept warns that children, pets should stay away."
-Carmel Pine Cone Headlines Sept 19 1997
At least three dogs died from Oct 1996 to September 1997 immediately
after drinking from the standing pools in the Carmel River.
One
attending veterinarian suspected a blue-green algae (also known as
cyanobacteria), but there was no investigation. "I've been here 35 years
and never seen anything like this before." said Carmel Valley
veterinarian Gerald Petkus. County Health Dept Director Melton said two
other dogs died after drinking water in 1996. No water samples were
taken. According to Melton the algae is "very toxic to any animal" (this
presumably includes humans).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Standing River Water.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 448 - ELEVATED WATER TEMPERATURES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Elevated Water Temperatures.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Elevated water temperatures can lead to stress, poor condition and poor survival in aquatic species.

As water temperature rises the maximum amount of dissolved-oxygen the water can hold decreases. Water can hold a maximum of about 15% DO at 0 (zero) degrees C, but only about 9% at 20 degrees C. Environmental Science; Morgan, Moran & Weirsma; W.C. Brown Pub. 1993 p 289

When a watercourse is lowered by pumping, the river or stream temperature increases. This increase can imperil fish and amphibians who depend on milder water temperatures for habitat and reproduction.

Trees cool large amounts of surface level air and land (especially black asphalt) by providing shade and by evaporation. When streamside trees

are removed the temperature of the stream can rise 10 degrees F or more.

Warm water discharge associated with power plants (Diablo Canyon nuclear and Moss Landing fuel powered) "can cause serious damage to giant and bull kelp forests through loss of adult tissue and early death as well as retardation of gametophytic and sporophytic development." DEIR Giant & Bull Kelp Fishing Regulations, Dec 2000

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Elevated Water Temperatures.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 449 - RUNOFF WATER TEMPERATURE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Runoff Water Temperature.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Runoff from an asphalt road or parking lot may have a temperature of 83 degrees F or more in the summer. Sensitive species such as trout prefer a temperature of 68 degrees F or less and begin dying when water temperature reaches 77 degrees F." The Cumulative Effects of Land Development on Streams, Rivers, Lakes, Tidal Waters & Wetlands, by Richard Klein 1979

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Runoff Water Temperature.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 450 - RUNOFF WATER TEMPERATURE IMPACTS ON EACH LISTED SPECIES.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Runoff Water Temperature impacts on Each Listed Species.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Runoff from an asphalt road or parking lot may have a temperature of 83 degrees F or more in the summer. Sensitive species such as trout prefer a temperature of 68 degrees F or less and begin dying when water temperature reaches 77 degrees F." The Cumulative Effects of Land Development on Streams, Rivers, Lakes, Tidal Waters & Wetlands, by Richard Klein 1979

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Runoff Water Temperature impacts on Each Listed Species.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 451 - RUNOFF WATER TEMPERATURE IMPACTS ON THE RED-LEGGED FROG.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Runoff Water Temperature Impacts on the Red-Legged Frog.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Runoff Water Temperature Impacts on the Red-Legged Frog.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.	25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.	The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Roadway Capacity.
5a. Please state the METHOD of measurement used to determine the significance for each criteria.	26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.	27. Please state whether the MARGIN of ERROR is measured or assumed.	Please graph the road capacity needed through the construction phase of the project.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.	28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.	Please graph the road capacity available through the construction phase of the project.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.	29. Please list all potential CUMULATIVE impacts related to this one.	QUANTIFICATION OF BASELINES AND IMPACTS: This impact appears to be potentially significant.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.	30. Please describe all potential CUMULATIVE impacts related to this one.	1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Roadway Capacity.
9. Please state the variance's MARGINS of ERROR or confidence level.	31. Please quantify all potential CUMULATIVE impacts related to this one.	1b. If no objective criteria are used please state that clearly.
10. Please state whether this MARGIN of ERROR is measured or assumed.	32. Please list, describe and quantify all potential compound and synergetic impacts.	2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
11. If an average is used, please state which kind of average.	33. Please list, describe and quantify all Construction impacts related to this one.	3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
12. Please state the most extreme values which could be encountered.	34. Please list, describe and quantify all Growth impacts related to this one.	3b. Please quote the definition used.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.	35. Please list, describe and quantify all Indirect impacts related to this one.	4. If no measurement units are used please state that clearly.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.	36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.	5a. Please state the METHOD of measurement used to determine the significance for each criteria.
15. Please provide a graph of HISTORICAL measurements.	37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.	5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
16. Please quantify the length of time this impact would last.	38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.	6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.	39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.	7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.	40. Please state whether the margin of error is measured or assumed.	8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.	41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.	9. Please state the variance's MARGINS of ERROR or confidence level.
20s. Please state whether this MARGIN of ERROR is measured or assumed.	42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.	10. Please state whether this MARGIN of ERROR is measured or assumed.
20b. If no margin of error is used please state that clearly.	43. Please name each EXPERT who prepared and reviewed this impact.	11. If an average is used, please state which kind of average.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.	44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.	12. Please state the most extreme values which could be encountered.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.	45. Please provide AVOIDANCE MITIGATION for this impact.	13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	46. Please provide the reverse of this impact as Mitigation.	14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
24. Please state whether the MARGIN of ERROR is measured or assumed.	47. Please provide an ALTERNATIVE which avoids this impact.	
	48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.	
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* 452 - ROADWAY CAPACITY.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 453 - LEVEL OF SERVICE (LOS) DELAY INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Level of Service (LOS) Delay Increase.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Level of Service measures traffic time delay up to 60 seconds.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Level of Service (LOS) Delay Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 454 - VOLUME TO CAPACITY RATIO (V/C) DELAY INCREASE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Volume to Capacity Ratio (v/c) Delay Increase.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The Pebble Beach Lot Program FEIR used a v/c increase of one percent as a significant impact with an existing evening rush hour (PM) Level of Service of "F".

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Volume to Capacity Ratio (v/c) Delay Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 455 - TRAFFIC GROWTH.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Traffic Growth.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Traffic Growth.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 456 - TRAFFIC VOLUMES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Traffic Volumes.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The Pebble Beach Lot Program FEIR used a traffic increase of one percent as a significant impact with an existing PM Level of Service of "F".

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Traffic Volumes.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 457 - QUEUE LENGTH INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Queue Length Increase.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

My training and experience as senior design engineer for an English race car manufacturer (Eldon/Saracen of Maidstone, Kent), many years study and teaching of higher math and applied physics and 30 years as a computer scientist makes it easy to understand the very basic engineering involved with determining traffic and other impacts this project would cause and worsen.

Queue Length is a another way to measure delay distinct from Level of Service. It measures the distance cars are stopped from an intersection.

Level of Service measures time - not distance.
Level of Service does not and cannot measure delay beyond 60 seconds.
Queue Length can measure delays far beyond one minute - up to hours.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Queue Length Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 458 - DELAY IN VEHICLE-HOURS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Delay in Vehicle-Hours.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Maximum and average driving delay can be measured in vehicle hours.
Access, p 22, Spring 2000, University of California Transportation Research

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Delay in Vehicle-Hours.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 459 - RELATIVE TRAFFIC LEVEL INCREASE (1 NEW VEHICLE TRIP IS SIGNIFICANT).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Relative Traffic Level increase (1 new vehicle trip is significant).

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

According to TAMC the two Intersections from Highway 1 to Carmel Valley,
Carmel Valley Road and Rio Road, are both operating at LOS "F" as of 1998.

Cal-Trans standard for a significant impact when an existing intersection is at LOS "F" is the addition of a single vehicle trip.
Any activity creating at least one new vehicle trip during rush hour is causing a significant impact:

"It is the Department's position that the addition of even one peak hour trip in a LOS 'F' environment represents a significant impact." (Cal-Trans letter dated Nov 18, 1997 to the Monterey County Planning Dept on the September Ranch project.)

LOS stands for "Level of Service" where the scale ranges from 'A' to 'F'

'A' means free-flowing, 'F' means gridlock - measured as a minimum trip delay of 60 seconds.

"Peak hour trip" means during rush hour (8 - 9:30 am and 4:00 - 5:30 pm)

Monterey County Public Works:

"If the Intersection is already operating at LOS F, any increase (one vehicle) in the critical movements volume to capacity ratio is considered significant."

"For Intersections already operating at unacceptable levels D or E, a significant impact would occur if a project adds 0.01 or more to the critical movements volume to capacity ratio."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Relative Traffic Level increase (1 new vehicle trip is significant).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
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27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
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45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 460 - COMMUTING TRAFFIC.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Commuting Traffic.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- The larger the distance between a job and the home - the more commuting traffic is caused.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Commuting Traffic.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 461 - TOURIST TRAFFIC.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Tourist Traffic.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Tourist Traffic can be significant in areas, like the Monterey Peninsula, where non-trivial amounts of hotels depend upon and advertise for tourist business. Tourist Traffic increases in the Summer as opposed to Holiday Traffic which centers around holidays.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Tourist Traffic.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 462 - HOLIDAY TRAFFIC.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Holiday Traffic.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

According to a 1999 Calif State Automobile Assoc survey "Monterey is one of the most popular destinations for in-state travelers, along with Tahoe and Southern California." Inns in Carmel and Pacific Grove were about 70 percent sold out for Thanksgiving 1999.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Holiday Traffic.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 463 - CONSTRUCTION TRAFFIC VOLUMES.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Construction Traffic Volumes.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

You can't have construction without construction vehicle traffic.

A single truck can carry about 10 cubic yards or soil or rock. Every 100 cubic yards of material removed requires at least 10 round trip truck trips - or 20 one-way truck trips. This does not include the heavy vehicle trips required for the equipment to load the trucks nor the support vehicles used by the employees.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Traffic Volumes.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 464 - CONSTRUCTION TRUCK TRAFFIC.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Construction Truck Traffic.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

What is the maximum number of tractor trailers which will be allowed on site at any one time?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Truck Traffic.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Construction Employee Traffic.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Construction crews finish work at rush hours. Construction employee traffic using private cars and other vehicles inherently adds to peak hour traffic congestion.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Employee Traffic.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

* 465 - CONSTRUCTION EMPLOYEE TRAFFIC.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 466 - HIGHWAYS CAUSE GROWTH.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Highways Cause Growth.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Highways Create Demand for Travel and Expansion by Their Very Existence."

In January 1997 US Federal District Court, Judge Suzanne B. Conlon for the Northern District of Illinois, Opinion wrote:

"Highways create demand for travel and expansion by their very existence. Swain v. Brinegar, 517 F.2d 766, 777 (7th Cir.1975); Def. 12 (M) Par. 86. However the final impact statement in this case relies on the implausible assumption that the same level of transportation needs will exist whether or not the toll road is constructed."
"[FHWA's] decision in this regard was arbitrary and capricious.
5 USC Sec 706(2)(a)."

This federal court opinion further reinforces the consensus of expert and legal opinion that expanded road capacity generates changes in travel and land activities that must be accounted for in project and plan appraisals. As one of the panelists at a Transportation Research Board (TRB) Annual Meeting session on the

induced travel effects of highway capacity changes observed last week, to general agreement from all other panelists, including Kevin Heanue, Director of Environment and Planning at FHWA, "There is no longer a question that these dynamics occur. The only question is how large are the effects in a particular case."

It should be obvious that since a lack of roads constrains growth, any increase in roads allows growth.

"Environmental Impact Statements on highways and sewage treatment plants seldom evaluate the resulting impact on urban growth patterns. These secondary effects may, however, be more damaging than the primary effects. The second form of shortsightedness is the tendency to consider only changes in the physical environment and to ignore changes in the social environment. Yet impacts on pollution patterns or community behavioral patterns may affect the quality of the human environment much more than impacts on air or solid waste."

U.S. EPA, letter to the President's Council of Environmental Quality
21 December, 1971

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Highways Cause Growth.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 467 - ADDING TRAFFIC LANES AS MITIGATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Adding Traffic Lanes as Mitigation.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

There is now overwhelming evidence, including a nationwide study of 70 metropolitan areas over 15 years (Texas Transportation Institute), another California specific study (Hansen 1995) which included Monterey County, that when an area is congested - additional lanes do not provide congestion relief.

These studies show that when an area is congested - additional lanes do not provide congestion relief. It is documented that additional lanes increase traffic.

Further it has been demonstrated in San Francisco and New York that when lane miles are removed congestion is alleviated (e.g. SF Central Freeway 1996, New York's West Side Highway 1988) shows that "When road capacity shrinks - So Can traffic" - Auto Free Times Winter 1996-97.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Adding Traffic Lanes as Mitigation.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
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29. Please list all potential CUMULATIVE impacts related to this one.
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31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
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35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 468 - ROAD CONSTRUCTION DELAYS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Road Construction Delays.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- The Surface Transportation Policy Project (STTP) released a fall 1999
report "Road Work Ahead: Is Construction Worth the Wait?"
The study
found that motorists can lose more time in road construction delays than
they will save in years of driving on the newly "improved" road.
- In a case study, the report highlights Trenton' Route 29 project, an \$85 million, four lane highway along the Delaware waterfront. The report shows that traffic delays stemming from the project are so long that it will take ten years for drivers to make up the time and actually benefit from the project. (Auto-Free Times Spring 2000, p 16)
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Road Construction Delays.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
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31. Please quantify all potential CUMULATIVE impacts related to this one.

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34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
The Pigou-Knight-Downs Paradox.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Economic theory can be applied to transportation. The Pigou-Knight-Downs paradox helps explain why expanding road capacity may elicit new demand with no improvement in congestion. The social cost of a trip on a congested roadway equals the private cost plus the cost of time lost in congestion.

Yet drivers can only rationally choose the route with the lower private cost. Expanding capacity may only reconvert the route with drivers who had been using alternative roads with spare capacity but a longer distance and travel time.

Please analyze the potential impacts of Pigou-Knight-Downs Paradox on the proposed roadway increases.
(by Sherman L. Lewis, Professor of Political Science
California State University, Hayward)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
The Pigou-Knight-Downs Paradox.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

* 469 - THE PIGOU-KNIGHT-DOWNS PARADOX.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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* 470 - ADDITIONAL STOP SIGNS INCREASING NOISE.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Additional Stop Signs Increasing Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

As vehicles accelerate away from a stop sign the engine noise rises
significantly above that of a vehicles transiting the same road at
a constant rate.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance of
Additional Stop Signs Increasing Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 471 - ADDITIONAL STOP SIGNS INCREASING DELAY.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Additional Stop Signs Increasing Delay.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Travel times increase for every vehicle as stop signs are added,
decreasing free flowing traffic which harms an area's Level of Service (LOS).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Additional Stop Signs Increasing Delay.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 472 - ADDITIONAL STOP SIGNS INCREASING DELAY.**

Travel times increase for every vehicle as stop signs are added,
decreasing free flowing traffic which harms an area's Level of Service (LOS).

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Additional Stop Signs Increasing Delay.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the
Primary mitigation measure:
Additional Stop Signs Increasing Delay.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the
primary mitigation measure:
Additional Stop Signs Increasing Delay.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the
primary mitigation measure: Additional Stop Signs Increasing Delay.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Additional Stop Signs Increasing Delay.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Additional Stop Signs Increasing Delay.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 473 - ADDITIONAL STOP LIGHTS INCREASING DELAY.

Travel times increase as stop lights are added, decreasing free flowing traffic which harms an area's Level of Service (LOS).

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Additional Stop Lights Increasing Delay.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the
Primary mitigation measure:
Additional Stop Lights Increasing Delay.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the
primary mitigation measure:
Additional Stop Lights Increasing Delay.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Additional Stop Lights Increasing Delay.

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This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

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Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Additional Stop Lights Increasing Delay.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

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MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

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J1. Please describe clearly how long the primary mitigation should last.

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O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 474 - ADDITIONAL STOP SIGNS INCREASING AIR POLLUTION.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of

Additional Stop Signs Increasing Air Pollution.

If you claim the document contains proof of no-significant-impact for

this impact please explicitly state the page number and paragraph.

Air pollution increases as stop signs are added. Stopped and accelerating vehicles emit significantly more air pollution than vehicles traveling at a steady state. Vehicle engines change speed when accelerating and decelerating, it is less efficient than when it operates at a steady speed. The amount can be roughly calculated from by comparing vehicles mpg figures in urban areas to their highway mpg. A range of 10% to 50% is typical. The increased air pollution should be similar in amount. Interestingly vehicles emit more pollution when coasting or decelerating than when accelerating.

When stop signs are added to residential areas, morning air pollution increases significantly because vehicles emit huge amounts of pollution upon startup, for about the first five miles, before the catalytic converters get up to operating temperature.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Additional Stop Signs Increasing Air Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 475 - ADDITIONAL STOP LIGHTS INCREASING AIR POLLUTION.

Air pollution increases as stop lights are added. Stopped and accelerating vehicles emit significantly more air pollution than vehicles traveling at a steady state. When stop lights are added to residential areas, morning air pollution increases significantly because vehicles emit huge amounts of pollution for about the first five miles before the catalytic converts get up to operating temperature.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Additional Stop Lights Increasing Air Pollution.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Additional Stop Lights Increasing Air Pollution.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Additional Stop Lights Increasing Air Pollution.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Additional Stop Lights Increasing Air Pollution.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Additional Stop Lights Increasing Air Pollution.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Additional Stop Lights Increasing Air Pollution.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONISs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 476 - STOP LIGHTS CAUSING ACCIDENTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Stop Lights Causing Accidents.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

In two months, a new traffic light installed on Highway 156 @ Castroville Blvd in Castroville, CA caused seven accidents including one fatality. "Its typical of what happens when a new traffic light or a stop sign is put in somewhere and people aren't used to it." according to Officer Tosha Jackson, spokeswoman for the California Highway Patrol in Salinas. -Herald, Mar 30, 2000

Monterey County Public Works Director Lew Bauman "New traffic signals, he cautioned, often result in serious accidents as people get used to them." Herald, May 20,00 pg A16

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Stop Lights Causing Accidents.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 477 - STOP SIGNS CAUSING ACCIDENTS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Stop Signs Causing Accidents.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Its typical of what happens when a new traffic light or a stop sign is put in somewhere and people aren't used to it." according to Officer
Tosha Jackson, spokeswoman for the California Highway Patrol in Salinas.
-Herald, Mar 30, 2000

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Stop Signs Causing Accidents.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 478 - ROAD DAMAGE TO TREE ROOTS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Road Damage to Tree Roots.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Road Damage to Tree Roots.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 479 - ROAD DUST HARMING VEGETATION AND HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Road Dust Harming Vegetation and Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Road Dust Harming Vegetation and Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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20b. If no margin of error is used please state that clearly.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 480 - PHYSICAL DIVISION OF AN ESTABLISHED HUMAN COMMUNITY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Physical Division of an established Human Community.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Freeways create a barrier to human travel.
This impact is normally significant and unmitigable.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Physical Division of an established Human Community.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.
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 12. Please state the most extreme values which could be encountered.
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 29. Please list all potential CUMULATIVE impacts related to this one.
 30. Please describe all potential CUMULATIVE impacts related to this one.
 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergetic impacts.
 33. Please list, describe and quantify all Construction impacts related to this one.
 34. Please list, describe and quantify all Growth impacts related to this one.
 35. Please list, describe and quantify all Indirect impacts related to this one.
 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
 37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
 38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
 39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
 40. Please state whether the margin of error is measured or assumed.
 41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
 42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
 43. Please name each EXPERT who prepared and reviewed this impact.
 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 481 - DISPLACEMENT.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Displacement.
- If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Displacement.
 - 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
 - 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
 - 3b. Please quote the definition used.
 4. If no measurement units are used please state that clearly.
 - 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
 - 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
 6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
 7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
 8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
 9. Please state the variance's MARGINS of ERROR or confidence level.
 10. Please state whether this MARGIN of ERROR is measured or assumed.
 11. If an average is used, please state which kind of average.
 12. Please state the most extreme values which could be encountered.
 13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
 14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20a. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 482 - JOBS-HOUSING IMBALANCE CAUSING FARTHER COMMUTES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Jobs-Housing Imbalance Causing Farther Commutes.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

When a project "creates jobs" - low wage jobs - the employees must travel farther to find affordable housing. This increases vehicle trips and attendant air pollution.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Jobs-Housing Imbalance Causing Farther Commutes.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 483 - PHYSICAL DIVISION OF AN ESTABLISHED WILDLIFE COMMUNITY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Physical Division of an established Wildlife Community.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

Freeways create a barrier to wildlife travel.
This impact is normally significant and unmitigable.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Physical Division of an established Wildlife Community.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 484 - WILDLIFE ROADKILL INCREASE.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Wildlife Roadkill Increase.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The more roads and wider roads that divide wild areas, the more wild animals are killed by cars and other vehicles. Imperiled species are killed by vehicles.

"The Humane Society and the Urban Wildlife Research Center estimate that more than 1 million large animals are killed annually on U.S. highways. Roadkills usually increase with traffic speeds and volumes. Studies in the state of Florida indicate that road kills are the primary cause of death for most large mammals, including several threatened species."
(Todd Littman)

The SPCA of Monterey County responds to 15 to 20 vehicle hit deer calls per month during mating season. They say the average car repair cost per collision is \$2,000. (Coast Weekly Nov 26, 2003)

After two years of anecdotal observation I estimate that in coastal Monterey County on roadways allowing 55 mph at least one animal is killed for every two lane-miles every day.

Animals on roads can also kill drivers. Cole Weston hit a horse near the entrance of Pt. Lobos and nearly lost his eye.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Wildlife Roadkill Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 485 - WILDLIFE UNDERPASSES.**

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Wildlife Underpasses.

Highway underpasses designed specifically for deer, panthers and other large mammals are successful at reducing roadkill in many areas. Fences can help funnel animals into the underpasses and bridges. - "Roadside Use Of Native Plants."

*** 486 - ROAD OBLITERATION.**

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of Road Obliteration.

Roads are essentially impervious land.
Removing roads increases infiltration, increases water tables, increases baseflow and decreases runoff temperatures.

This Alternative does not require any non-off-the shelf technology.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

*** 487 - BICYCLE TRAVEL.**

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Bicycle Travel.

Comparing the Environmental Impacts of Bicycles to Cars.

Bike	Car	
Air pollution	None	NOX,HC,CO2,CO,and the carcinogens benzene, MTBE and formaldehyde

Fuel Consumed	renewable	Limited fossil hydrocarbons
carbohydrates		

Lane Width	2 feet	12 feet

Path width	4 feet	120 feet (ten lanes)

Parking Space	12 ft ^2	120 ft^1

Can be taken on		
Mass Transit	Yes	No

Requires Subsidies		
of Sales Taxes		
& Bonds	No	Yes

*** 488 - BICYCLE TRAVEL.**

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of Bicycle Travel.

Comparing the Environmental Impacts of Bicycles to Cars.

Bike	Car	
Air pollution	None	NOX,HC,CO2,CO,and the carcinogens benzene, MTBE and formaldehyde

Fuel Consumed	renewable	Limited fossil hydrocarbons
carbohydrates		

Lane Width	2 feet	12 feet

Path width	4 feet	120 feet (ten lanes)

Parking Space	12 ft ^2	120 ft^1

Can be taken on		
Mass Transit	Yes	No

Requires Subsidies		
of Sales Taxes		
& Bonds	No	Yes

This Alternative does not require any non-off-the shelf technology.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits

of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this

alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 489 - CARPOOL PERCENTAGE OVERESTIMATE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Carpool Percentage OverEstimate.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Survey forms returned to the ZeroWaste conference in Monterey in 1998, the showed less than 10 percent of the meeting attendees carpooled.
Please provide substantial evidence of this carpool factor.

If the carpool percentage number is even a small amount too high it can grossly underestimate the traffic and parking needs.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Carpool Percentage OverEstimate.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 490 - HIGHWAY 68 EXCEEDS CAPACITY.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Highway 68 Exceeds Capacity.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Traffic along the entire State Route 68 (SR68) corridor currently exceeds capacity. Approved development along SR68 will increase congestion by approximately 20% creating longer peak periods on both SR68 and Blanco Road." Doug Bilsee, Recent TAMC Senior Transportation Planner quoted in TAMC Minutes Oct 27, 1999 (From Highway 68 Corridor Study)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Highway 68 Exceeds Capacity.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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46. Please provide the reverse of this impact as Mitigation.

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* 491 - HOLMAN HIGHWAY - HIGHWAY 68 QUEUE LENGTH INCREASE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Holman Highway - Highway 68 Queue Length Increase.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The existing queue length from Highway 1 backing up towards Pacific Grove during morning and evening rush hour often extends for a half mile. It is not unusual for the stop and go traffic to extend beyond the Skyline Forest intersection. The typical delay takes a half dozen light cycle changes to advance southward through the Highway 1 Signalized intersection.

At the same time, the existing queue length from Highway 1 backing down towards Monterey during morning and evening rush hour often extends for a half mile. It is not unusual for the stop and go traffic to extend down the onramp from Del Monte Center. The typical delay takes a half dozen light cycle changes to advance westward through the Highway 1 Signalized intersection.

At the same time, the existing queue length from Highway 1 backing up towards Carmel during morning and evening rush hour often extends for

a half mile. It is not unusual for the stop and go traffic to extend back onto the freeway prior to the offramp for Pacific Grove. The typical delay takes a half dozen light cycle changes to advance westward through the Highway 1 Signalized intersection.

None of these three conditions are at the same time as event traffic or during a tourist season or a holiday. All three of those add additional vehicles and delay.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Holman Highway - Highway 68 Queue Length Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 492 - HIGHWAY 1 TOWARDS BIG SUR QUEUE LENGTH INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of

Highway 1 towards Big Sur Queue Length Increase.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The existing queue length from Rio Road backing up towards Big Sur on weekends and holidays often extends for several miles. It is not unusual for the stop and go traffic to extend to Rocky Point - some 8 miles. The typical delay takes dozens of light cycle changes to advance northward through the Rio Road Signalized intersection.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Highway 1 towards Big Sur Queue Length Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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* 493 - CARMEL VALLEY ROAD QUEUE LENGTH INCREASE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Carmel Valley Road Queue Length Increase.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The existing queue length at Carmel Valley Road extends for over a half mile east to the signalized intersection at the Middle School. It typically takes 5 light cycle changes to advance westward through the Rancho Blvd Signalized intersection.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Carmel Valley Road Queue Length Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 494 - GLYPHOSATE (RODEO OR ROUNDUP ETC.) PESTICIDE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Glyphosate (Rodeo or Roundup etc.) Pesticide.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Glyphosate is one of the most common poisons used in the United States. According to a U.S. Environmental Protection Agency (EPA) report some 38-48 million pounds were used in the U.S. in 1997.

"Glyphosate was not included in a USGS study of pesticides in watersheds because the method of analysis is difficult and time consuming." Joseph Domagalski, USGS, Sacramento.

"[Glyphosate was] registered, in part, from data generated by a company called Industrial Biotest (IBT). IBT was the nation's largest commercial toxicological testing company until its fraudulent testing was discovered in [1976]." "All of Monsanto's toxicological registration data for Roundup came from IBT." "[IBT] performed fraudulent tests absolving Roundup of causing mutations in mice and tumors in rabbits." Beyond the Beauty Strip, Mitch Lansky 1992, Tilbury House

"Roundup is Monsanto's most profitable product." Rachel's Environment and Health Weekly #637, #638, #639

When EPA registers a chemical - The product itself is not tested only the "active" ingredient, in this case the (Glyphosate) chemical.

Chemical ingredients of the poisonous pesticides called "Inerts" are often toxic and can compose more than 99 percent of the product, yet the DEIR does not recognize, disclose, analyze or mitigate them. Please fix this. (See PANUPS article attached)

RACHEL'S ENVIRONMENT & HEALTH WEEKLY #590, March 19, 1998
FROGS, ALLIGATORS, AND PESTICIDES -
"The Australian government in 1997 took an unprecedented action, banning 84 herbicide products for use near water because of their harmful effects on tadpoles and frogs.[8]

"All of the 84 banned products contain Monsanto's glyphosate as the active ingredient. However, the harmful component appears to be not the glyphosate itself but an 'inert' ingredient --a detergent or wetting agent added to the herbicides so that droplets of liquid spread out and cover the target leaves."

"Detergents interfere with the ability of frogs to breathe through their skin, and tadpoles to breathe through their gills. Michael J. Tyler of the Department of Zoology at the University of Adelaide, Australia, says, "Although the herbicide [glyphosate] is claimed to be 'environmentally friendly,' it is clear that users have been lulled into a false sense of security."

[8] Michael J. Tyler, "Herbicides Kill Frogs," FROGLOG No. 21 (March 1997), pg. 2.

What is the chemical composition of each of the "inerts" in the Glyphosate products proposed for use?

The herbicide Roundup, manufactured by Monsanto and marketed as an "environmentally friendly" chemical, is a case in which some of the known inert ingredients in some formulations have far greater toxicity than the active ingredient (glyphosate). Two of these ingredients, isopropylamine and polyethoxylated tallowamines (POEAs), cause a range of health problems including nausea, vomiting, diarrhea, wheezing, burns, excess fluids in the lungs and eye, skin and gastrointestinal irritation. Glyphosate products were the third leading cause of both acute pesticide poisoning and skin and eye illnesses among California farm workers between 1984 and 1990.

According to a 1990 "Spectrum Report done for Maine's Forest for the Future Program - Rainbow Trout fingerlings (essentially genetically identical to the ESA listed Steelhead) has a LC-50 of 1.3 milligrams per liter with Roundup. This is in dramatic contrast to Glyphosate alone which California's Department of Fish & Game asserts has an LC-50 of 130 milligrams per liter.

Chemicals known to be toxic (e.g., POEA or polyoxyethyleneamine, naphthalene, and zinc). POEA is present in Monsanto's glyphosate formulations Roundup and Vision. The POEA is 400 times more toxic to

immature salmon than a glyphosate formulation, Rodeo, that contains no POEA. It belongs to a class of surfactants that have been reported to cause adverse gastrointestinal and central nervous system effects and damage to red blood cells. POEA is contaminated with 1,4-dioxane, a chemical that causes toxic effects in the liver and kidneys of humans and various cancers in numerous animal species.

Surfactants can have two effects on droplet surface tension. They can increase or decrease surface tension, but they can not do both.

Increasing surface tension makes larger drops which drift less and do not adhere to plants as well.

Decreasing surface tension makes smaller drops which drift more and absorb better to target plants.

So please clarify which is proposed?
Less or more surface tension?

What impurities are allowed by EPA in the glyphosate product?

What amounts of each impurity is allowed by EPA in the glyphosate product?

What illegal impurities have been found in the glyphosate product?

What amounts of each impurity has been found in the glyphosate product?

Metabolites and breakdown products of Glyphosate include the Proposition 65 known carcinogen Formaldehyde. It also causes gene mutations and is a reproductive toxicant. (CATs citing Lund 1986)

What amounts of Formaldehyde will be released by the proposed use?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Glyphosate (Rodeo or Roundup etc.) Pesticide.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 495 - DDT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of DDT.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The EPA has set the Ambient Water Quality Protection of Aquatic Organisms criteria for DDT at 1 part per Trillion (with a "T").

Contrary to almost everyone's belief, DDT is not banned in the US.

After a public outcry and several lawsuits it was "cancelled" in 1973

(37 FR 13369), which does not mean DDT cannot be manufactured or exported or even used in the US if EPA finds certain uses are necessary.

In fact DDT is manufactured in the US, some 65 tons were exported in 1992 (the most recent year records are available) and if the EPA Secretary for some reason (like an emergency) decides to - she could allow DDT's immediate U.S. use. DDT can also turn up as an "impurity" in some products up to 15 percent (legally up to 50%) by weight.

DDT has a biological half life of 8 years. Three half-lives have passed since it was supposedly "banned," yet it is turning up fresh in many rivers around the US.

"DDT is being preserved in soils all over California." DDT in the Salinas Valley, 1986, California Water Resources Control Board Report # 86-2-WQ.

The lower fifty (50) miles of the Salinas River (Hydro Unit # 309.100) is on the US EPA's CWA 303(d) list for Pesticide contamination exceeding TMDL limits. The pesticides come from Agriculture, Irrigated Crop production, Agriculture-storm runoff, Agriculture-irrigation tailwater, Agriculture Return flows, and non-point source pollution.

"DDT has been found in moderate to high concentrations in the Salinas River and lower Moss Landing watershed for many years." DDT in the Salinas Valley, 1986, California Water Resources Control Board Report # 86-2-WQ.

US-EPA's Preliminary Remediation Goal (PRG) for DDT concentrations is 5.6 mg/kg.

Western Farm Service in Salinas, CA had DDT soil concentrations detected up to 251 gm/kg in 1992.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of DDT.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 496 - PEPPERMINT OIL (DDT ALTERNATIVE).

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Peppermint Oil (DDT Alternative).

Peppermint Oil (from *Mentha pipeirta*) floated on top of mosquito larvae-filled water killed nearly all larvae in 24 hours.

Applied to humans as a repellent it averaged 85% effective. It was especially effective against *Anopheles culicifacies* - the principal malaria carrier in India. - Scientific American Feb. 2000 citing Bioresource Technology

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 497 - ORGANOPHOSPHORUS PESTICIDE COMPOUNDS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Organophosphorus Pesticide Compounds.

If you claim the document contains proof of no-significant-impact for

this impact please explicitly state the page number and paragraph.

Organophosphorus pesticide compounds include Diazinon and Malathion and are nerve agents originally developed in Nazi Germany in the 1930s. Because Organophosphorus pesticides are now widely used on food crops they were the first family of compounds to be evaluated under the 1996 FQPA.

CUMULATIVE

According to Mark Miller, M.D. MPH a member of the Environmental Health Committee of the American Academy of Pediatrics (quoted in Coast Weekly April 22 1999) - even low level exposure to Organophosphorus pesticide compounds (e.g. diazinon, cypermethrin, Chlorpyrifos, hydramethlynon, propetamphos and Malathion) may cause symptoms. "The effects of organophosphates are cumulative so that if the chemical used in the home and in food is added to those used on school grounds, something may tip the bucket."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Organophosphorus Pesticide Compounds.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 498 - DIAZANON.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Diazanon.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Unreported pesticide use is about 20 percent of total California pesticide use. Obviously for some specific chemicals that percentage is higher. In the case of Diazanon it is a lot higher at about 45% of all Diazanon use. Which helps explain why Diazanon is the second most commonly detected pesticide detected in California surface waters. ("Disrupting the Balance", 1999 CPR)

According to Mark Miller, M.D. MPH a member of the Environmental Health Committee of the American Academy of Pediatrics (quoted in Coast Weekly April 22 1999) - even low level exposure to Organophosphorus pesticide

compounds (e.g. diazinon, cypermethrin, Chlorpyrifos, hydramethlynon, propetamphos and Malathion) may cause symptoms. "The effects of organophosphates are cumulative so that if the chemical used in the home and in food is added to those used on school grounds, something may tip the bucket."

Organophosphorus pesticide compounds (e.g. Diazinon and Malathion) are nerve agents originally developed in Nazi Germany in the 1930s.

The twenty most heavily used golf course pesticides in the US in 1982 (and their use in thousands of pounds of active ingredient) were:
Chlorothalonil (1,298), MCPP mecoprop (1,096), MSMA (834), Iprodione (815), Thiram (635), Diazinon (512)...

The EPA has set the Ambient Water Quality Protection of Aquatic Organisms criteria for Diazinon at 9 parts per TRILLION.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Diazinon.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 499 - TRICHLOROETHYLENE (TCE).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Trichloroethylene (TCE).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

TCE is on the ATSDR list of hazardous substances (N=275) of the 20 most hazardous Substances:

TCE (Trichloroethylene) is known to the state of California to cause cancer and listed under Proposition 65.
It was found widely in Ft. Ord's groundwater at levels up to 400 ppb.

It is mislabeled in Federally registered pesticides as an "inert" ingredient.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of

Trichloroethylene (TCE).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 500 - SEWAGE SLUDGE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Sewage Sludge.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

"Toxic chemicals, infectious organisms, and endotoxins or cellular material may all be present in biosolids."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Sewage Sludge.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 501 - ETHYLENE GLYCOL.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Ethylene Glycol.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Vehicle antifreeze is typically made of Ethylene Glycol.
"As little as two ounces of Ethylene Glycol can kill a dog and only one
teaspoon is enough to kill a cat." Safe Brands Co. brochure, Omaha NE
At least one condor has died from drinking water containing
Ethylene Glycol antifreeze.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact
significance of
Ethylene Glycol.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows

whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 502 - PROPOLYENE GLYCOL.

The Document appears to have ignored this potentially feasible Alternative.

Please carefully analyze and disclose the potential benefits of Propylene Glycol.

Propylene Glycol is an alternate antifreeze chemical which is generally considered non-toxic to children and wildlife.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or

assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

* 503 - PEPPERMINT OIL.

The Document appears to have ignored this potentially feasible Alternative. Please carefully analyze and disclose the potential benefits of Peppermint Oil.

Peppermint Oil can repel mosquitos and kill nearly all their larvae

when floated on their breeding water. Scientific American Feb, 2001, p 24

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 504 - MOLD - STACHYBOTRYS CHARTARUM.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Mold - Stachybotrys Chartarum.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

A smelly greenish-black natural fungus along Coastal California. It can grow where ever buildings have a water leak. It has toxic and allergic properties. Some doctors advise "vacate and remediate" in order to prevent "irreversible brain damage and pulmonary bleeding." Herald Oct 21, 2001

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance of
Mold - Stachybotrys Chartarum.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 505 - PHTHALATES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Phthalates.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Ubiquitous man-made oily solvents which make plastic flexible have become the most abundant chemicals in the environment. They can produce reproductive impairment in males at levels of 100 mg of DBP / kg of body weight in mother. Sci News Apr 3, 99

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Phthalates.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 506 - WASTE GENERATION, DISPOSAL & REDUCTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of

Waste Generation, Disposal & Reduction.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Waste Reduction Rates Mandated by Law
Assembly Bill 939 requires each city and county within California to reduce its waste stream by 50% by the year 2000. The County of Monterey is currently implementing programs to meet this mandated goal. Because this project is located within Monterey County, all waste generated during any phase of the project will become part of the County's overall waste stream. The hundreds of tons of waste from this project, if landfilled, would have a significant impact on the County's overall

recycling rate, driving it downward, and potentially hindering the County from reaching and maintaining the 50% reduction mandate. This failure in reaching and/or maintaining the recycling rate could potentially result in the California Integrated Waste Management Board issuing fines of \$10,000 per day until the County meets the 50% recycling rate.

It is imperative that the specific steps be described in detail that will be taken to ensure that construction and clearing debris will be kept out of the landfill and reused or recycled to the greatest extent possible. A detailed plan for reuse and recycling of all debris generated during the project needs to be included in the Environmental Impact Report. The specific areas to be addressed should include (but does not represent an extensive listing):

1) Reuse and Recycling of Debris Created during Clearing:

A. Soil:

1. How many tons of soil will be removed during clearing?
2. How will this be disposed of?
3. What percentage of it will be landfilled?
4. If landfilled, where will it be disposed?
5. Will it be kept separate from other debris (rocks, trees, brush, etc.) to be classified as "clean soil" to be reused?
6. What percentage will be kept separate?
7. How will it be kept separate from other types of debris?
8. Will it be reused at the Marina Landfill as clean soil?
9. What percentage of total soil will be reused in this manner?
10. If not reused at the Marina landfill, what other sites will accept the soil for reuse or recycling?
11. What percentage of soil will be reused at the construction site?
12. How will it be reused on site?
13. How much will it cost (disposal fees and transportation costs) to dispose of this soil?
14. How many truck trips will be needed to transport the soil to the disposal or reuse site?
15. How many days will be required to transport all the soil?
16. What impacts will these truck trips have on existing traffic?

B. Trees and Vegetation:

1. How many tons of trees and vegetation (trunks, branches, stumps) will be removed during clearing?
2. What percentage of it will be landfilled?
3. If landfilled, where will it be disposed?
4. Will it be kept separate from other debris (rocks, soil, brush, etc.) to be classified as "clean wood waste or yard waste" to be recycled?
5. What percentage will be kept separate?
6. How will it be kept separate from other types of debris?
7. Will it be recycled at the Marina Landfill in their wood processing line?
8. What percentage of total trees will be recycled in this manner?
9. If not recycled at the Marina landfill, what other sites will accept the trees for recycling?
10. How will stumps be disposed of--reused, recycled, or landfilled?
11. How much will it cost (disposal fees and transportation costs) to dispose of the trees?

12. How many truck trips will be needed to transport the trees to the disposal or reuse site?
13. How many days will be required to transport all the trees?
14. What impacts will these truck trips have on existing traffic?

C. Rocks--

1. How many tons of rocks will be removed during clearing?
2. What percentage of these will be landfilled?
3. If landfilled, where will it be disposed?
4. Will it be kept separate from other debris (trees, soil, brush, etc.) to be reused?
5. What percentage will be kept separate?
6. How will it be kept separate from other types of debris?
7. Will it be reused at the Marina Landfill?
8. What percentage of total rocks will be reused in this manner?
9. If not reused at the Marina landfill, what other sites will accept the rocks for reuse?
10. What percentage of the rocks will be reused at the construction site?
11. How will it be reused on site?
12. How much will it cost (disposal fees and transportation costs) to dispose of the rocks?
13. How many truck trips will be needed to transport the rocks to the disposal or reuse site?
14. How many days will be required to transport all the rocks?
15. What impacts will these truck trips have on existing traffic?

D. Debris Created During Construction:

1. Wood waste (ex. lumber, plywood, pallets)--
2. How many tons of wood waste will be created during construction?
3. How will it be disposed of?
4. What percentage of it will be landfilled?
5. If landfilled, where will it be disposed?
6. Will it be kept separate from other debris (soil, rebar, concrete, etc.) to be recycled?
7. What percentage will be kept separate?
8. How will it be kept separate from other types of debris?
9. Will it be recycled at the Marina Landfill as part of their wood processing line?
10. What percentage of total wood waste will be recycled in this manner?
11. If not recycled at the Marina Landfill, what other sites will accept the wood waste for recycling?
12. What percentage of lumber, plywood, and/or pallets will be reused at the construction site?
13. How will it be reused on site?
14. How much will it cost (disposal fees and transportation costs) to dispose of the wood waste?
15. How many truck trips will be needed to transport the wood waste to the disposal or recycling site?
16. How many days will be required to transport all the wood waste?
17. What impacts will these truck trips have on existing traffic?

E. Rebar and Other Metal--

1. How many tons of scrap metal will be created during construction?
2. How will it be disposed of?
3. What percentage of it will be landfilled?
4. If landfilled, where will it be disposed?
5. Will it be kept separate from other debris (soil, concrete, wood waste, etc.) to be recycled?
6. What percentage of it will be kept separate?

7. How will it be kept separate from other types of debris?
 8. Will it be recycled at the Marina Landfill?
 9. What percentage of total scrap metal will be recycled in this manner?
 10. If not recycled at the Marina Landfill, what other sites will accept scrap metal for recycling?
 11. How much will it cost (disposal fees and transportation costs) to dispose of the scrap metal?
 12. How many truck trips will be needed to transport the scrap metal to the disposal or recycling site?
 13. How many days will be required to transport all the scrap metal?
 14. What impacts will these truck trips have on existing traffic?

2) Recycled Content Materials Used in Construction:
 Not only is it important to recycle as much of the debris created from the proposed project, but it is also important to utilize construction materials made with recycled content. Following are some major opportunities to integrate recycled feedstock into the project. Please quantify how much recycled material will be used (tons) and what percentage of recycled material to raw material will be used (e.g 50% aggregate roadbase will be from recycled materials).

1. What percentage of asphalt pavement used in the paving or repaving of roads will be made from recycled asphalt paving?
 2. How many tons of recycled materials will be used?

3. What percentage of aggregate roadbase will be recycled aggregate?
 4. How many tons of recycled materials will be used?

5. What percentage of sub-roadbase will be recycled aggregate?
 6. How many tons of recycled materials will be used?

7. What percentage of shoulders will be recycled aggregate?
 8. How many tons of recycled materials will be used?

9. What percentage of reclaimed asphalt roofing scrap will be used in the asphalt paving?
 10. How many tons of recycled materials will be used?

11. What percentage of crumb rubber from recycled tires will be used in the asphalt paving, aggregate base, and subbase?
 12. How many tons of recycled materials will be used?

13. What percentage of recycled glass cullet will be used in the asphalt paving?
 14. How many tons of recycled materials will be used?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Waste Generation, Disposal & Reduction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 507 - LANDFILL LEAKAGE.

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of Landfill Leakage.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

All Dumps leak, whether they have superliners or not.

According to Peter Montague and Rachel's Hazardous Waste Weekly:
In the FEDERAL REGISTER Feb. 5, 1981, the EPA first stated its opinion that
All Landfills Will Eventually Leak

"There is good theoretical and empirical evidence that the hazardous constituents that are placed in land disposal facilities very likely will migrate from the facility into the broader environment. This may occur several years, even many decades, after placement of the waste in the facility, but data and scientific prediction indicate that, in most cases, even with the application of best available land disposal technology, it will occur eventually." [pg. 11128]

"Manmade permeable materials that might be used for liners or covers (e.g., membrane liners or other materials) are subject to eventual deterioration, and although this might not occur for 10, 20 or more years, it eventually occurs and, when it does, leachate will migrate out of the facility." [pg. 11128]

"Unfortunately, at the present time, it is not technologically and institutionally possible to contain wastes and constituents forever or for the long time periods that may be necessary to allow adequate degradation to be achieved." [pg. 11129]

"Consequently, the regulation of hazardous waste land disposal facilities must proceed from the assumption that migration of hazardous wastes and their constituents and by-products from a land disposal facility will inevitably occur." [pg. 11129]

More than a year later, on July 26, 1982, the EPA again put its opinions into the FEDERAL REGISTER, emphasizing that all landfills will inevitably leak:

"A liner is a barrier technology that prevents or greatly restricts migration of liquids into the ground. No liner, however, can keep all liquids out of the ground for all time. Eventually liners will either degrade, tear, or crack and will allow liquids to migrate out of the unit." [pg. 32284]

"Some have argued that liners are devices that provide a perpetual seal against any migration from a waste management unit. EPA has concluded that the more reasonable assumption, based on what is known about the pressures placed on liners over time, is that any liner will begin to leak eventually." [pgs. 32284-32285].

In the FEDERAL REGISTER May 26, 1981, pgs. 28314 through 28328), the EPA argued forcefully that all landfills will eventually leak. Another EPA quote:

"Many organic constituents are stable (degrade very slowly); other hazardous constituents (e.g., toxic metals) never degrade. Yet the existing technology for disposing of hazardous wastes on or in the land cannot confidently isolate these wastes from the environment forever.

"Since disposing of hazardous wastes in or on the land inevitable [inevitably?] results in the release of hazardous constituents to the environment at some time, any land disposal facility creates some risk." [pg. 28315]

EPA went on to estimate that the duration of the hazard from a landfill would be "many thousands of years." [pg. 28315] And the Agency said, "The longer one wishes to contain waste, the more difficult the task becomes. Synthetic liners and caps will degrade; soil liners and caps may erode and crack. ...EPA is not aware of any field data showing successful long-term containment of waste at facilities which have not been maintained over time." [pg. 28324]

"Ultimately, waste reduction and resource recovery probably provide the best alternative to land disposal," said the EPA [pg. 28325], though it has never begun any programs to make this happen.

Also Courtesy of Peter Montague and RACHEL'S ENVIRONMENT & HEALTH WEEKLY:

A 1992 report from a California engineering-consulting firm, G. Fred Lee & Associates, has examined recent scientific studies and has confirmed once again why modern "dry tomb" landfill technology will always fail and should always be expected to poison groundwater.[1]

The new report, authored by Fred Lee and Anne Jones, reviews recent evidence--much of it produced by government-funded research--that landfill liners leak for a variety of reasons; that leachate collection systems clog up and thus fail to prevent landfill leakage; that landfill leachate will remain a danger to groundwater for thousands of years; that even low-rainfall areas are not safe for landfill placement; that gravel pits and canyons are particularly dangerous locations for landfills; that maintaining a single landfill's cap for the duration of

the hazard would cost hundreds of billions, or even trillions, of dollars; that groundwater monitoring cannot be expected to detect landfill leakage; that groundwater, once it is contaminated, cannot be cleaned up and must be considered permanently destroyed; and that groundwater is a limited and diminishing resource which modern societies grow more dependent on as time passes.

A 1990 examination of the best available landfill liners concluded that brand-new state-of-the-art liners of high density polyethylene (HDPE) can be expected to leak at the rate of about 20 gallons per acre per day (200 liters per hectare per day) even if they are installed with the very best and most expensive quality-control procedures.[2] This rate of leakage is caused by pinholes during manufacture, and by holes created when the seams are welded together during landfill construction. (Landfill liners are rolled out like huge carpets and then are welded together, side by side, to create a continuous field of plastic.) Now examination of actual landfill liners reveals that even the best seams contain some holes.

In addition to leakage caused by pinholes and failed seams, new scientific evidence indicates that HDPE (high density polyethylene, the preferred liner for landfills) allows some chemicals to pass through it quite readily. A 1991 report from University of Wisconsin shows that dilute solutions of common solvents, such as xylenes, toluene, trichloroethylene (TCE), and methylene chloride, penetrate HDPE in one to thirteen days. Even an HDPE sheet 100 mils thick (a tenth of an inch)--the thickness used in the most expensive landfills) is penetrated by solvents in less than two weeks.

Another problem that has recently become apparent with HDPE liners is "stress cracking" or "brittle fracture." For reasons that are not well understood, polyethylenes, including HDPE, become brittle and develop cracks. A 1990 paper published by the American Society for Testing Materials revealed that HDPE liners have failed from stress cracks in only two years of use. Polyethylene pipe, intended to give 50 years of service, has failed in two years. Lee and Jones sum up (pg. 22), "While the long-term stability of geomembranes (flexible membrane liners) in landfills cannot be defined, there is no doubt that they will eventually fail to function as an impermeable barrier to leachate transport from a landfill to groundwater. Further, and most importantly at this time, there are no test methods, having demonstrated reliability, with which to evaluate long-term performance of flexible membrane liners."

Recent scientific studies of clay indicate that landfill liners of

compacted clay leak readily too. For example, a 1990 study concludes,

"[i]f a naturally occurring clay soil is compacted to high density, thereby producing a material with very low hydraulic conductivity, and if it is maintained within the same ranges of temperature, pressure, and chemical and biological environment, it would be expected to function well as a seepage barrier indefinitely. In waste containment applications, however, conditions do not remain the same. The permeation [penetration] of a compacted clay liner by chemicals of many types is inevitable, since no compacted clay or any other type of liner material is either totally impervious or immune to chemical interactions of various types."

The 1992 study by Lee and Jones is an excellent resource for anyone wanting to understand why landfills always fail. In their footnotes, they cite 18 other studies of landfill problems that they themselves have authored, so their expertise is unquestionable, their information reliable, their arguments solid.

There has been sufficient scientific evidence available for a decade to convince any reasonable person that landfills leak poisons into our water supplies.

[1] G. Fred Lee and Anne R. Jones, MUNICIPAL SOLID WASTE MANAGEMENT IN LINED, "DRY TOMB" LANDFILLS: A TECHNOLOGICALLY FLAWED APPROACH FOR PROTECTION OF GROUNDWATER QUALITY (El Macero, Calif.: G. Fred Lee & Associates, March, 1992). Available from: G. Fred Lee & Associates, 27298 East El Macero Drive, El Macero, CA 95618-1005. Phone (916) 753-9630. 67 pgs.; free.

[2] Rudolph Bonaparte and Beth A. Gross, "Field Behavior of Double-Liner Systems," in Rudolph Bonaparte (editor), WASTE CONTAINMENT SYSTEMS: CONSTRUCTION, REGULATION, AND PERFORMANCE [Geotechnical Special Publication No. 26] (New York: American Society of Civil Engineers, 1990), pgs. 52-83.

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1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Landfill Leakage.

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* 508 - LANDFILLS.

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Please carefully analyze and disclose the potential impacts of Landfills.

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Landfill Basics

WHAT IS A LANDFILL?

A secure landfill is a carefully engineered depression in the ground (or built on top of the ground, resembling a football stadium) into which wastes are put. The aim is to avoid any hydraulic [water-related] connection between the wastes and the surrounding environment, particularly groundwater. Basically, a landfill is a bathtub in the ground; a double-lined landfill is one bathtub inside another. Bathtubs leak two ways: out the bottom or over the top.

WHAT IS THE COMPOSITION OF A LANDFILL?

There are four critical elements in a secure landfill: a bottom liner, a leachate collection system, a cover, and the natural hydrogeologic setting. The natural setting can be selected to minimize the possibility of wastes escaping to groundwater beneath a landfill. The three other elements must be engineered. Each of these elements is critical to success.

THE NATURAL HYDROGEOLOGIC SETTING:

You want the geology to do two contradictory things for you. To prevent the wastes from escaping, you want rocks as tight (waterproof) as possible. Yet if leakage occurs, you want the geology to be as simple as possible so you can easily predict where the wastes will go. Then you can put down wells and capture the escaped wastes by pumping. Fractured bedrock is highly undesirable beneath a landfill because the wastes cannot be located if they escape. Mines and quarries should be avoided because they frequently contact the groundwater.

WHAT IS A BOTTOM LINER?

It may be one or more layers of clay or a synthetic flexible membrane (or a combination of these). The liner effectively creates a bathtub in the ground. If the bottom liner fails, wastes will migrate directly into the environment. There are three types of liners: clay, plastic, and composite.

WHAT IS WRONG WITH A CLAY LINER?

Natural clay is often fractured and cracked. A mechanism called diffusion will move organic chemicals like benzene through a three-foot thick clay landfill liner in approximately five years. Some chemicals can degrade clay.

WHAT IS WRONG WITH A PLASTIC LINER?

The very best landfill liners today are made of a tough plastic film called high density polyethylene (HDPE). A number of household chemicals will degrade HDPE, permeating it (passing through it), making it lose its strength, softening it, or making it become brittle and crack. Not only will household chemicals, such as moth balls, degrade HDPE, but much more benign things can cause it to develop stress cracks, such as margarine, vinegar, ethyl alcohol (booze), shoe polish, peppermint oil, to name a few.

WHAT IS WRONG WITH COMPOSITE LINERS?

A Composite liner is a single liner made of two parts, a plastic liner and compacted soil (usually clay soil). Reports show that all plastic liners (also called Flexible Membrane Liners, or FMLs) will have some leaks. It is important to realize that all materials used as liners are at least slightly permeable to liquids or gases and a certain amount of permeation through liners should be expected. Additional leakage results from defects such as cracks, holes, and faulty seams. Studies show that a 10-acre landfill will have a leak rate somewhere between 0.2 and 10 gallons per day.

WHAT IS A LEACHATE COLLECTION SYSTEM?

Leachate is water that gets badly contaminated by contacting wastes. It seeps to the bottom of a landfill and is collected by a system of pipes. The bottom of the landfill is sloped; pipes laid along the bottom capture contaminated water and other fluid (leachate) as they accumulate. The pumped leachate is treated at a wastewater treatment plant (and the solids removed from the leachate during this step are returned to the landfill, or are sent to some other landfill). If leachate collection pipes clog up and leachate remains in the landfill, fluids can build up in the bathtub. The resulting liquid pressure becomes the main force driving waste out the bottom of the landfill when the bottom liner fails.

WHAT ARE SOME OF THE PROBLEMS WITH LEACHATE COLLECTION SYSTEMS?

Leachate collection systems can clog up in less than a decade. They fail in several known ways:

1. they clog up from silt or mud;
2. they can clog up because of growth of microorganisms in the pipes;
3. they can clog up because of a chemical reaction leading to the precipitation of minerals in the pipes; or
4. the pipes become weakened by chemical attack (acids, solvents, oxidizing agents, or corrosion) and may then be crushed by the tons of garbage piled on them.

WHAT IS A COVER?

A cover or cap is an umbrella over the landfill to keep water out (to prevent leachate formation). It will generally consist of several sloped

layers: clay or membrane liner (to prevent rain from intruding), overlain by a very permeable layer of sandy or gravelly soil (to promote rain runoff), overlain by topsoil in which vegetation can root (to stabilize the underlying layers of the cover). If the cover (cap) is not maintained, rain will enter the landfill resulting in buildup of leachate to the point where the bathtub overflows its sides and wastes enter the environment.

WHAT ARE THE PROBLEMS WITH COVERS?

Covers are vulnerable to attack from at least seven sources:

1. Erosion by natural weathering (rain, hail, snow, freeze-thaw cycles, and wind)
2. Vegetation, such as shrubs and trees that continually compete with grasses for available space, sending down roots that will relentlessly seek to penetrate the cover;
3. Burrowing or soil-dwelling mammals (woodchucks, mice, moles, voles), reptiles (snakes, tortoises), insects (ants, beetles), and worms will present constant threats to the integrity of the cover;
4. Sunlight (if any of these other natural agents should succeed in uncovering a portion of the umbrella) will dry out clay (permitting cracks to develop), or destroy membrane liners through the action of ultraviolet radiation;
5. Subsidence--an uneven cave-in of the cap caused by settling of wastes or organic decay of wastes, or by loss of liquids from landfilled drums--can result in cracks in clay or tears in membrane liners, or result in ponding on the surface, which can make a clay cap mushy or can subject the cap to freeze-thaw pressures;
6. Rubber tires, which "float" upward in a landfill; and
7. Human activities of many kinds.

Prepared by:

Environmental Research Foundation, P.O. Box 5036.
Annapolis, MD 21403-7036
phone (410) 263-1584, fax (410) 263-8944

QUESTIONS ABOUT LANDFILLS

It is important to have a basic understanding of a proposed landfill.

How big will the landfill be in acres?

What is the depth of the landfill in feet, and what will be the height of the highest point of the cap after the landfill is closed?

How much of the acreage will be filled with garbage?

How much of the acreage will be used for the buffer zone?

How much of the acreage will be unused?

What is the maximum tons per day they will accept?

Does the contract have a minimum tons per day quota (often called put or pay clauses)? If it does who is responsible for finding the additional tonnage or the money in lieu of the tonnage?

What type of garbage will it be filled with: municipal solid waste, medical waste, hazardous waste, low level radioactive waste, below

regulatory concern (brc) waste, special waste (often incinerator ash), incinerator ash, industrial solid waste, demolition debris, other waste?

Will they be putting recyclables in the landfill (glass, aluminum, tin, paper, etc.)?

Will they be putting clean organic compostables in the landfill (for example, yard wastes)?

If they are putting recyclables and organic compostables in the landfill will they be putting them in separate cells?

In tons per day, how much of the garbage will come from your town, county, state, out-of-state?

How many years will the landfill be in operation?

Federal Law requires all landfills to be lined. Will it be lined and capped? If so what will these be made of?

How long will the operators be responsible for it once it is closed, often referred to as the post-closure period?

Who will be responsible for it once the post-closure period is over?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Landfills.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 509 - LANDFILLS GENERATE METHANE GAS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Landfills Generate Methane Gas.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Landfills Generate large amounts of Methane Gas, enough that when the gas is used as a fuel for a methane generator to provide all the power needed to electrify the entire landfill at Marina, California and enough left over to sell at a profit.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance of Landfills Generate Methane Gas.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 510 - NOISE CAUSING DEATH.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Noise causing Death.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Noise can kill at 180 dBA.
Living in The Environment by G. Tyler Miller pg 320, Wadsworth Publishing 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Noise causing Death.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 511 - NOISE CAUSING PERMANENT HEARING LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Noise causing Permanent Hearing Loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Ringin in the Ears
NIPTS, or noise induced permanent threshold shift, is just that -- the minimum level at which a person can perceive sound permanently shifts to a higher level. In layman's terms, a person incurs a permanent hearing loss of some degree. It is hypothesized that years of incurring a daily temporary threshold shift (TTS) may eventually lead to an NIPTS of similar magnitude.

"Sound pressure becomes damaging at about 75 dbA."
Living in The
Environment by G. Tyler Miller pg 320, Wadsworth
Publishing 1998

OSHA maximum noise level is 90 dBA.

Shouting in the ear can reach 110 dB. Scientific American July 2002

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Noise causing Permanent Hearing Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 512 - TEMPORARY THRESHOLD SHIFT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Temporary Threshold Shift.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

A temporary reduction in hearing acuity, which is referred to as
temporary threshold shift (TTS)

A temporary threshold shift is a common effect of noise on hearing in noisy industrial and entertainment situations. When an individual is tested for hearing acuity, an audiometer is used to establish the lowest levels of sound that person can perceive at different frequency bands. After exposure to high noise levels for a short time, or moderate noise levels over a long time, the minimum level that the person can perceive may shift to a higher level. Temporary shifts of 20 to 30 dB are usual in healthy ears in noisy situations with a typical eight-hour exposure. This shift is only temporary, however; a 100% recovery of the pre-noise exposure hearing acuity usually occurs within several hours. TTS is also known as "auditory fatigue."

"Sound pressure becomes damaging at about 75 dbA." Living in The Environment by G. Tyler Miller pg 320, Wadsworth Publishing 1998

Shouting in the ear can reach 110 dB. Scientific American July 2002

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of

Temporary Threshold Shift.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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-
* 513 - NON-HEARING-LOSS NOISE HARM TO HUMAN HEALTH.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Non-Hearing-Loss Noise Harm to Human Health.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

Annoying noise can cause "... stress, migraine headaches, gastric ulcers, insomnia, elevated blood pressure and psychological disorders including increased aggression." Living in The Environment by G. Tyler Miller pg 320, Wadsworth Publishing 1998

The World Health Organization asserts that noise exceeding 45 decibels can interfere with healthful sleep.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Non-Hearing-Loss Noise Harm to Human Health.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 514 - HIGH FREQUENCY ULTRASONIC NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
High Frequency Ultrasonic Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
High Frequency Ultrasonic Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows

whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 515 - LOW FREQUENCY INFRASOUND NOISE.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Low Frequency Infrasound Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

High Volume - Low Frequency Noise Human Harm

"The lower end of the audible acoustical spectrum is approximately 20 Hz. Below this frequency people cannot generally hear sound but can easily sense vibrations in their bodies. Intense sound in this frequency range can also excite resonances in various body cavities causing a feeling of nausea or discomfort. Intense infrasound can also cause walls and floors to vibrate, rattling windows and household items. The effects of this low frequency sound are discussed in this chapter."

"Low frequency sound can be directly absorbed through the surface of the body and can excite sense organs other than the ears. The effect is similar to the effect of mechanical vibration on the body, causing the internal organs to vibrate and disturbing the nervous system, digestion and sight. Very intense low frequency noise (0-20 Hz) can cause a sensation of vibration, disequilibrium, motion sickness, speech disturbance, and blurring of vision, just to name a few. Frequencies from 5-9 Hz have been shown to affect the liver, spleen, and stomach, while somewhat higher frequencies may result in mouth, throat, bladder or rectal pain."

"Workers in extremely noisy situations complain of distraction from nausea, disequilibrium, disorientation, headache, lassitude, and blurring of vision. French workers have reported disorders of the circulatory and nervous systems as a result of exposure to infrasound... Industrial equipment often produces inaudible vibrations which, after prolonged exposure, cause specific complaints of giddiness, nausea, and anxiety not found after similar exposure to noise in the audible range."
- AVIATION NOISE EFFECTS, FEDERAL AVIATION ADMINISTRATION, WASHINGTON, DC; MAR 1985, U.S. DEPARTMENT OF COMMERCE

"Whale Songs lengthen in response to Sonar." Nature, Vol 405 22 Jun 2000

"The Growler" is a mobile sound unit that emits such "unholy shrieks and roars" that every human being within a radius of ten city blocks is paralyzed with unbearable pain: they collapse in their tracks and curl up losing all control of their bowels and bleeding from the ears."
Scanlan's Monthly, June 1970

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Low Frequency Infrasound Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that

number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 516 - NOISE ANNOYANCE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Noise Annoyance.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Outdoor yearly levels on the Ldn [DNL] scale are sufficient to protect public health and welfare if they do not exceed 55 dBA in sensitive areas (residences, schools, and hospitals)." (EPA Publication #319, "Protective Noise Levels," 1978).

EPA describes 55 Ldn as a "significant noise impact." Hank Medwin, Past President, Acoustical Society of America.

".. 55 dB is the protective level, with a safety margin against annoyance." (Environmental Protection, Emil Chanlett 1979)

"U.S. Navy standards limit continuous exposure to shipboard noise to 60 dB." Scientific American, July 2002

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Noise Annoyance.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 517 - SPEECH INTERFERENCE LEVELS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Speech Interference Levels.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"One of the frustrating results of noise is the masking effect it produces in reducing the intelligibility of speech. For example, if the speaker and listener are separated by 5 feet, the levels of noise that will barely permit reliable word intelligibility are 50 decibels (dB) for normal conversation 57 dB for raised speech; 62 dB for very loud speech; and 69 dB for shouting." Van Nostrand's Scientific Encyclopedia, Fifth Edition 1976

"There appears to be a wide consensus that the most satisfactory spoken communication occurs when the speech-to-noise ratio exceeds 15 dB (the speech signal exceeds the background noise by 15 decibels). Since the strength of the unaided human voice is limited, ideal listening conditions are achieved by reducing the background environmental noise levels."

- From a paper presented 17 June 1997 to the Acoustical Society of America - America's Need for Standards and Guidelines to Ensure Satisfactory Classroom Acoustics at the 133rd Meeting of the ASA, State College, PA by David Lubman, Westminster, CA

EPA describes 55 Ldn as a "significant noise impact."
Hank Medwin, Past President, Acoustical Society of America.

Telephone conversation is difficult at 65 to 75 dB SIL.
A 45 dB SIL or lower is desirable for private offices and conference rooms. (Environmental Protection, Emil Chanlett 1979)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Speech Interference Levels.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 518 - ABSOLUTE NOISE LEVELS (55 DECIBELS IS TOO LOUD).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Absolute Noise levels (55 Decibels is Too Loud).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

EPA describes 55 Ldn as a "significant noise impact."

70 decibels is the sound level of a typical home vacuum cleaner.
- Living in the Environment pg 320

To protect against general annoyance, noise should not exceed 55 decibels. "...an Ldn of 70 is the protective level, with a safety margin, for permanent hearing impairment, and that 55 [decibels] is the protective level, with a safety margin against annoyance." - From Environmental Protection, pg 546, by Emil T. Chanlett, Professor, Department of Environmental Sciences and Engineering, School of Public Health, University of North Carolina, Chapel Hill.

HUD AND VA CRITERIA.

Both the Department of Housing and Urban Development and the Veterans' Administration have issued noise regulations. The purpose of the HUD regulations is to protect individuals from noise in their communities and places of residence. Basically, HUD policy states that HUD assistance is prohibited for projects with "Unacceptable" noise exposures (noise levels above 75 dB (DNL) and is discouraged for projects with "Normally Unacceptable" noise exposures (i.e. a noise level above 65 dB but under 75 dB). These noise levels take into account noise from highways, railroads and aircraft.

OSHA maximum noise level is 90 dBA.

The Veterans' Administration has also issued a series of statements of policy regarding noise and land use planning.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Absolute Noise levels (55 Decibels is Too Loud).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 519 - RELATIVE NOISE LEVEL INCREASE (10 DECIBEL INCREASE IS SIGNIFICANT).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Relative Noise Level increase (10 Decibel Increase is significant).

If you claim the document contains proof of no-significant-impact for

this impact please explicitly state the page number and paragraph.

When there is a noise intrusion of 10dB, (i.e. $L_{dn} > 60dB$) one can expect "widespread complaints" and "threats of legal action." (Table 10 of von Gierke and Eldred, "Effects of Noise on People" Noise News/International, June 1993)

Relative noise impact can be measured by estimating how far away noise from the activity can be heard. In a city sometimes construction noise can even be drowned out, but in a rural area construction vehicles can be heard for miles.

Please prepare a map showing the maximum distance the noise can be heard during the day, and separately - during the night.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Relative Noise Level increase (10 Decibel Increase is significant).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 520 - NOISE CHARACTER (55 DECIBELS IS MUCH WORSE THAN 55 DECIBELS).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Noise Character (55 Decibels is much worse than 55 Decibels).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Two noises at the same decibel level are not equal in annoyance.
Fingernails on a chalkboard can be highly disturbing even when below 55 decibels.

When an object (e.g. aircraft or bullet) exceeds the speed of sound it causes a sonic boom, that can shake houses, scare people and humans.
"The booms alone would produce an environment with a composite noise rating of 101 to 115 dB. Experts offer the opinion that such exposures will result in strong complaints and legal action."
(Environmental Protection, Emil Chanlett 1979)

Very few people pay good money purely to listen to the sound of jet airplanes taking off at a sound level of 100 to 120 decibels. Yet

countless millions of people pay \$20 to \$100 to hear music concerts at 110 decibels. Living in the Environment pg 320.

The same is true at lower sound levels. Even when the decibel levels are equal, most people would find the noise of a chainsaw more annoying than the voice of their favorite person when both have the same sound level.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Noise Character (55 Decibels is much worse than 55 Decibels).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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* 521 - MAXIMUM NOISE VS. AVERAGE NOISE (CNEL OR LDN).

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Maximum Noise vs. Average Noise (CNEL or Ldn).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Damage is Not about Average Noise levels.

It is the loudest noises - the maximum noise levels, which do the most irreversible hearing damage.

Annoyance is Not about Average Noise

People do not often complain about noise at CNEL or Ldn levels as measured and mapped for General Plans.

People specifically complain about the loudest or "peak" noises -- those which significantly exceed CNEL and Ldn levels.

CNEL (Community Noise Equivalent Level) and Ldn (Level Day/Night) are average noise levels which do not recognize peak or maximum noise impacts.

Damaging and highly annoying noises unrecognized by CNEL or Ldn include impulse or short term noises such as dog barking, gun shots at a firing range, car horns, truck back up beepers, or aircraft overflights.

Renowned humorist and riverboat pilot Mark Twain once observed --

"I never cross a river when I only know its average depth is six inches."

Twain's comment vividly illustrates how the use of a bald average can drown you.

Why? Because CNEL and Ldn are average noise levels - not peak levels.

Ldn and CNEL also cannot distinguish between two otherwise similar neighborhoods where one endures short term loud ("impulse") noises such as dog barking, gunfire or car horns. This can also be due to using CNEL or Ldn instruments (i.e. analog) which cannot respond rapidly enough to detect short term noises.

CNEL and Ldn will not adequately recognize harmful and disturbing regular, predictable leaf blower, lawnmower or chainsaw noise - in part because those noises will most often occur when there is no CNEL or Ldn monitoring.

The California Courts agree:

In *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners of the City of Oakland*, 91 Cal.App.4th 1344 (2001), the First District Court of Appeal invalidated the Port of Oakland's certification of an EIR for the Airport Development Plan.

"The court found that the EIR had failed to adequately address the noise impacts from nighttime air cargo operations. Specifically, the court made clear that the EIR's reliance on the CNEL metric as the sole criterion to evaluate the significance of the project's noise impacts inappropriately excluded consideration of the potential sleep disturbance impacts on area residents resulting from nighttime flights. In reaching this conclusion, the court acknowledged the expert opinion that supported the need for this noise analysis, public concern about nighttime noise impacts, and the CEQA standards of significance, which recognize a site-sensitive threshold for evaluating noise impacts."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Maximum Noise vs. Average Noise (CNEL or Ldn).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 522 - MAXIMUM NOISE LEVEL (LMAX) MEASUREMENTS.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Maximum Noise Level (Lmax) Measurements.

Damaging and highly annoying noises recognized by Lmax (Noise Level maximum) include impulse or short term noises such as dog barking, gun shots at a firing range, car horns, truck back up beepers, or aircraft overflights.

Lmax is easily measured by modern digital sound level meters with a recording function.

Please include noise contour maps of Lmax exceeding 45 dBA in the project area (along with any required CNEL maps).

* 523 - NOISE IMPACTS ON WILDLIFE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Noise Impacts on Wildlife.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Effects [of noise] on animals have not been studied extensively. These are analogous to those in humans. There is auditory loss which deprives the animal of signals of danger or the presence of prey. Animals depend on hearing in territorial stakeouts, courtship, mating. Noise which masks natural sounds can be detrimental to survival. Impulse noises produce startle, violent escape efforts, and panic. Noise around construction work, factories, and airports disrupt habitats. Such responses have caused injuries to domestic cattle and horses in stalls. Animals migrate from such conditions when an alternate area can be found." (Environmental Protection, Emil Chanlett 1979), citing "Effect of Noise on Wildlife and other Animals," EPA-NTID 300.5.J.Fletcher, 1971

The threshold of significance should be whether an objectionable noise can be heard beyond the limits of the minimum land area of its origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Noise Impacts on Wildlife.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

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*** 524 - ANIMALS ABANDONING NESTS AND HOMES DUE TO INCREASED NOISE AND DUST.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Animals Abandoning Nests and Homes Due to Increased Noise and Dust.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Animals Abandoning Nests and Homes Due to Increased Noise and Dust.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 525 - INCREASED TRAFFIC VOLUMES INCREASE TRAFFIC NOISE VOLUME.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Increased Traffic Volumes Increase Traffic Noise Volume.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Highway noise is dependent upon these factors:

- A) Traffic Volume - Noise goes up as volume increases.
 - B) Traffic Speeds - Noise increases as speed increases.
 - C) Number of Trucks - Noise goes up with a greater number of trucks.
- Federal Highway Administration. "Analysis of 23 CFR 772"

Measured noise levels according to the LEAGUE FOR THE HARD OF HEARING -
March 14, 2000: Heavy traffic 85 dBA

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Increased Traffic Volumes Increase Traffic Noise Volume.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 526 - INCREASED TRAFFIC VOLUMES INCREASE TRAFFIC NOISE DURATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Increased Traffic Volumes Increase Traffic Noise Duration.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Increased Traffic Volumes Increase Traffic Noise Duration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20a. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
 23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 24. Please state whether the MARGIN of ERROR is measured or assumed.
 25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
 26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 27. Please state whether the MARGIN of ERROR is measured or assumed.
 28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
 29. Please list all potential CUMULATIVE impacts related to this one.
 30. Please describe all potential CUMULATIVE impacts related to this one.
 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergetic impacts.
 33. Please list, describe and quantify all Construction impacts related to this one.
 34. Please list, describe and quantify all Growth impacts related to this one.
 35. Please list, describe and quantify all Indirect impacts related to this one.
 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 527 - LOSS OF NOISE REDUCTION BENEFITS FROM TREES.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Loss of Noise Reduction Benefits from Trees.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- Trees also help reduce noise, provide habitat for songbirds and other wildlife, reduce surface runoff and protect urban water resources, and enhance the aesthetic quality of life in the city. California Code 4799.07. The Legislature finds and declares that:
(e) Trees also help reduce noise, provide habitat for songbirds and other wildlife, reduce surface runoff and protect urban water resources, and enhance the aesthetic quality of life in the city.
- It takes a 61 meter (190 foot) deep wall of dense vegetation to provide
a 10 dbA decrease in road noise.
-Federal Highway Administration
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
- Loss of Noise Reduction Benefits from Trees.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 528 - MOTORCYCLE NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Motorcycle Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Motorcycles can cause noise as loud as 110 dbA. Effects of Noise on People, Eldred & von Gerike, Noise/News International, Vol 1, No. 2, 1993 June

Measured noise levels according to the LEAGUE FOR THE HARD OF HEARING -
March 14, 2000: Motorcycle 95 - 110 dbA

Motorcycles generate 85 dbA at 15 meters. Federal Register 39:121 p 22, 297 (Jun 21, 1974)

The threshold of significance should be whether an objectionable noise can be heard beyond the limits of the minimum land area of its origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Motorcycle Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 529 - BUS NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Bus Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Buses generate 82 dBA at 15 meters. Federal Register
39:121 p 22,297
(Jun 21, 1974)

The threshold of significance should be whether an objectionable noise can be heard beyond the limits of the minimum land area of its origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Bus Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 530 - CAR NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Car Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

A car HORN can cause 110 dBA of noise. (LEAGUE FOR THE HARD OF HEARING - Updated March 14, 2000)

An automobile at 15 meters can cause noise as loud as 90 dbA. Effects of Noise on People, Eldred & von Gierke, Noise/News International, Vol 1, No. 2, 1993 June

Cars generate 69 dBA at 15 meters. Federal Register 39:121 p 22,297 (Jun 21, 1974)

The threshold of significance should be whether an objectionable noise can be heard beyond the limits of the minimum land area of its origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Car Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 531 - TRUCK NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Truck Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Highway noise is dependent upon these factors:
A) Traffic Volume - Noise increases as volume increases.
B) Traffic Speeds - Noise increases as speed increases.
C) Number of Trucks - Noise increases with a greater number of trucks.
-Federal Highway Administration. "Analysis of 23 CFR 772"

Highway noise is also dependent upon these factors:
D) Acceleration - Noise increases during acceleration.
E) Grade - Noise increases when ascending a hill.

A diesel truck accelerating at full throttle from 35 mph can generate
100 decibels at 100 hertz at 50 ft. Environmental Impact Analysis
Handbook, page 4-17.

A heavy truck at 15 meters can cause noise as loud as 89 dbA. Effects of
Noise on People, Eldred & von Gerike, Noise/News International, Vol 1,
No. 2, 1993 June

Truck Noise is significantly louder than typical traffic noise.
A heavy truck at 90 feet and 40 mph can make about 99 dbA of noise.
-Rosner, Hy and Joan., Albuquerque's Environmental Story, pgs 224, 225

A diesel truck going at 45 mph and 50 feet away will produce a noise
source of 84 dbA. -M.C. Branch, Outdoor Noise and the Metropolitan
Environment, L.A. Dept of City Planning, 1970

Trucks, heavy-medium generate 84 dBA. Federal Register
39:121 p 22,297
(Jun 21, 1974)

Post-project & other-project construction truck noise can be very loud.
Truck noise increases as they accelerate from a stop.
Truck noise increases as they whine uphill under load.

The threshold of significance should be whether an objectionable noise
can be heard beyond the limits of the minimum land area of its origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Truck Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 532 - NON-TRUCK TRAFFIC NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Non-Truck Traffic Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Non-Truck Traffic Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 533 - DELIVERY VEHICLES NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Delivery Vehicles Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Delivery vehicles normally use diesel engines.
Delivery vehicles almost always leave their engines running.
Stopped, running Delivery vehicles have impacts from the exhaust, noise
and "parking" if you can call stopping-in-a-roadway - parking.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Delivery Vehicles Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 534 - CONSTRUCTION NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Construction Noise.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Please provide a complete inventory of all noises made by construction including: vehicle noise and non-vehicle noise. Measured noise levels according to the LEAGUE FOR THE HARD OF HEARING - March 14, 2000: Pneumatic drills 120 dBA Jackhammer 130 dBA

Please state the ambient sound levels of the quietest areas. Please state the maximum number of hours per day of construction. Please state the maximum number of days until buildout.

The threshold of significance should be whether an objectionable noise can be heard beyond the limits of the minimum land area of its origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 535 - CONSTRUCTION VEHICLE NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Construction Vehicle Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Vehicle Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 536 - CONSTRUCTION TRUCK NOISE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Construction Truck Noise.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Construction Truck Noise is notably louder than typical truck traffic. Backing trucks emit a loud annoying beeping which can be heard for miles in an otherwise quiet setting.

The threshold of significance should be whether an objectionable noise can be heard beyond the limits of the minimum land area of its origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Truck Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 537 - CONSTRUCTION HEAVY VEHICLE NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Construction Heavy Vehicle Noise.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Heavy Construction Vehicles including Bulldozers and Graders make unrestricted, unregulated noise.

Pneumatic Breakers can generate 111 dBA.
Pile Drivers can generate 105 dBA.
Bulldozers can generate 103 dBA.
Scrapers can generate 102 dBA.
Mobile Cranes can generate 102 dBA.
Pavers can generate 102 dBA.
Hydraulic Breakers can generate 100 dBA.
All in Leq from - Worker's Compensation Board of British Columbia,
Engineering Section Report, 1999

Bulldozers generate 87 dBA at 15 meters.
Scrapers generate 88 dBA at 15 meters.
All cited in the Federal Register 39:121 p 22,297 (Jun 21, 1974)

Heavy Trucks generate 88 dBA at 50 feet.
Backhoes generate 85 dBA at 50 feet.
Environmental Noise Pollution 1977, P. Cuniff

Bulldozers can generate 96 dBA
Cranes can generate 96 dBA
Earth Tampers can generate 96 dBA
Front-end loaders can generate 94 dBA
Gradealls can generate 94 dBA

Backhoes can generate 93 dBA
Cited as measured levels by The Center to Protect Workers Rights, 2003

What is the maximum number of Heavy Construction Vehicles to be allowed to operate at any one time?
What is the earliest hour (e.g. 9am) they will be allowed to operate?
Will they be allowed to operate on weekends?
Will they be allowed to operate during winter rains?

OSHA maximum noise level is 90 dBA.

The threshold of significance should be whether an objectionable noise can be heard beyond the limits of the minimum land area of its origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction Heavy Vehicle Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 538 - CONSTRUCTION NON-VEHICLE NOISE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Construction non-vehicle Noise.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Some construction activities (like Pile driving for bridges) cause excessive groundborne noise and vibration.

Pneumatic Tools generate 85 dBA at 50 feet.
Environmental Noise Pollution 1977, P. Cuniff

Pile drivers generate 101 dBA at 15 meters.
Rockdrills generate 98 dBA at 15 meters.
Scrapers generate 88 dBA at 15 meters.
Compressors generate 81 dBA at 15 meters.
All cited in the Federal Register 39:121 p 22,297 (Jun 21, 1974)

Shop tools (i.e. circular saw, router, drill, sander, grinder) can cause noise as loud as 110 dbA. Effects of Noise on People, Eldred & von Gerike, Noise/News International, Vol 1, No. 2, 1993 June

A hammer drill can cause 114 dBA.
A chainsaw can cause 109 dBA.
An impact wrench can cause 102 dBA.
A miter saw can cause 102 dBA.
A skill saw can cause 100 dBA.
A hand drill can cause 98 dBA.
A router can cause 95 dBA.
A planer can cause 94 dBA.
A belt sander can cause, 94 dBA.
A table saw can cause 93 dBA.

A circular sander can cause 90 dBA.
Decibel levels cited by NIOSH & CDC on their website.

Construction sites use loud (110 dBA at 15 feet) hydrocarbon (gasoline and diesel) power generators. MPWMD Safety Meeting Minutes Dec 22, 2000

OSHA maximum noise level is 90 dBA.

The threshold of significance should be whether an objectionable noise can be heard beyond the limits of the minimum land area of its origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Construction non-vehicle Noise.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 539 - WOOD CHIPPING NOISE & AIR POLLUTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Wood Chipping Noise & Air Pollution.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Wood chippers can exceed 110 dbA. When gas powered they generate unregulated air pollution.

A wood chipper generated 96 dbA on Feb 20, 2004 measured by Herman Medwin Ph.D. (Past President, Acoustical Society of America.) It was operating across the street from his home in Pebble Beach, California.

The threshold of significance should be whether an objectionable noise can be heard beyond the limits of the minimum land area of its origin.

County Noise ordinance 2450, Section 3 (Chapter 10.60.030) prohibits operating any device producing a noise level exceeding 85 dbA at 50 feet in the unincorporated county. Exempted are Aircraft and when more than 2,500 feet from an occupied dwelling. Misdemeanor, \$500 fine, 6 months in jail.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance of
Wood Chipping Noise & Air Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 540 - CHAINSAW NOISE & AIR POLLUTION.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Chainsaw Noise & Air Pollution.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Measured noise levels according to the LEAGUE FOR THE HARD OF HEARING -
Garden Equipment and Power Tools Lawn mowers, leaf blowers, chain saws
and other power tools can be as loud as 130 dBA and pose a serious risk
to those who operate them.
A chainsaw can cause noise as loud as 130 dbA (LEAGUE FOR THE HARD OF
HEARING - March 14, 2000)

A chainsaw can cause noise as loud as 115 dbA. Effects of Noise on
People, Eldred & von Gerike, Noise/News International, Vol 1, No. 2,
1993 June

A chainsaw can cause noise as loud as 112 dbA Leq from -
Worker's
Compensation Board of British Columbia, Engineering
Section Report, 1999

Chainsaw noise is not merely loud, many people find its
particular noise
especially annoying. This noise is often even worse as they
are often
used in quiet places.

Chainsaws generate large amounts of unregulated air
pollution.

The threshold of significance should be whether an
objectionable noise
can be heard beyond the limits of the minimum land area of
its origin.

County Noise ordinance 2450, Section 3 (Chapter 10.60.030)
prohibits
operating any device producing a noise level exceeding 85
dBA at 50 feet
in the unincorporated county. Exempted are Aircraft and
when more than
2,500 feet from an occupied dwelling. Misdemeanor, \$500
fine, 6 months
in jail.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the
objective
(non-subjective) CRITERIA used to determine the impact
significance of
Chainsaw Noise & Air Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe
how the threshold of significance chosen is scientifically
testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS
(numbers) used to determine the significance for EACH
criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to
determine the significance for each criteria.

5b. If no method of measurement was used please state that
clearly for each criteria and explain thoroughly how the data
was obtained.

6. Please quantify the existing or current BASELINE
measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level
and whether the MARGIN of ERROR is measured or
assumed.

8. Please state the VARIANCE or fluctuation, assumed or
expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or
confidence level.

10. Please state whether this MARGIN of ERROR is
measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be
encountered.

13. Please describe and quantify which criteria and
ASSUMPTIONS the Impact Significance predictions are
most SENSITIVE.

14. Please analyze and quantify how sensitive those
predictions are to reasonably foreseeable varying criteria and
assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time
period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the
impact changes from significant to less-than-significant and
the clear criteria and rationale for that
number.

19. Please provide the MARGIN of ERROR used (in percent
and absolute amount) for measuring the Significance
THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is
measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the
impact changes from LEGAL to ILLEGAL for ALL related and
potentially relevant local, state and federal
laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP
with increasing input, other impacts have complex non-linear
relationships. Please provide a graph that shows

whether the relationship is linear or otherwise - when at and
near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM
CHANGE, to which the IMPACT could raise or lower the
baseline number and its MARGIN of ERROR or confidence
levels.

24. Please state whether the MARGIN of ERROR is
measured or assumed.

25. Please state whether this total PERCENT maximum
change is an AVERAGE amount, a worst case expected or a
best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to
which the impact would raise or lower the baseline number
and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is
measured or assumed.

28. Please state whether this total maximum change amount
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case expected.

29. Please list all potential CUMULATIVE impacts related to
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related to this one.

31. Please quantify all potential CUMULATIVE impacts
related to this one.

32. Please list, describe and quantify all potential compound
and synergetic impacts.

33. Please list, describe and quantify all Construction
impacts related to this one.

34. Please list, describe and quantify all Growth impacts
related to this one.

35. Please list, describe and quantify all Indirect impacts
related to this one.

36. Please list and quantify every OTHER IMPACT - this
impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the
RESOURCE this impact affects.

38. Please state the METHOD of measurement used to
determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence
level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or
assumed.

41. Please quantify what is the maximum amount (in
AMOUNT of existing) of this resource that can be lost and
still be restored.

42. Please quantify what is the MAXIMUM amount (in
PERCENTAGE of existing) of this resource that can be
LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed
this impact.

44. Please cite each expert's training, and peer reviewed,
validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this
impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 541 - HAND-SAW.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Hand-Saw.

Compared with chainsaws - handsaws in normal use generate noise no louder than 52 dBA, they emit no air pollution and generate a fraction of the amount of sawdust.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each

measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

* 542 - AXE.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Axe.

A Hatchet and an Axe are alternatives to chainsaws.

Compared with chainsaws - they are rarely louder than 52 dBA, they emit no air pollution and generate a fraction of the amount of sawdust.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 543 - LANDSCAPING MACHINES.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of Landscaping Machines.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Measured noise levels according to the LEAGUE FOR THE HARD OF HEARING - Garden equipment and power tools, lawn mowers, leaf blowers, chain saws and other power tools can be as loud as 130 dBA and pose a serious risk to those who operate them.

A power lawnmower can cause noise as loud as 95 dbA.
Effects of Noise on People, Eldred & von Gerike, Noise/News International, Vol 1, No. 2, 1993 June

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Landscaping Machines.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

*** 544 - RIDING LAWN MOWER (GOLF COURSE).**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Riding Lawn Mower (Golf Course).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

A Toro Reelmaster 5100 D generated 76 dBA on June 4, 1994 at Pebble Beach Company's Spanish Bay Golf Course. (PBC DEIR, Feb 2004)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Riding Lawn Mower (Golf Course).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

*** 545 - NATIVE TREE PLANTING TO REDUCE NOISE.**

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Native Tree Planting to Reduce Noise.

California Code 4799.07. The Legislature finds and declares that:

(e) Trees also help reduce noise, provide habitat for songbirds and other wildlife, reduce surface runoff and protect urban water resources, and enhance the aesthetic quality of life in the city.

-

*** 546 - PILE DRIVING DONE WITH A VIBRATOR.**

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Pile Driving done with a Vibrator.

A post can be driven into the ground when it is vibrated at its natural frequency greatly reducing noise and energy use. "Design of Design", Gordon Glegg, 1974

The threshold of significance should be whether an objectionable noise can be heard beyond the limits of the minimum land area of its origin.

* 547 - NOISE BARRIERS.

Cal-Trans found that Sound walls create an unforeseen problem: The high frequency noise bounces off the wall, and people who live as far as a half mile away can suddenly hear zooming vehicles. -Castleman, "Now Hear This", Sierra Magazine

Noise barriers can easily cost \$220 per foot. Jim Esbaugh, Greiner Engineers, Albuquerque 1999.

It takes a 61 meter (190 foot) deep wall of dense vegetation to provide a 10 dbA decrease in road noise. -Federal Highway Administration

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Noise Barriers.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the
Primary mitigation measure:
Noise Barriers.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the
primary mitigation measure:
Noise Barriers.

using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the
primary mitigation measure: Noise Barriers.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Noise Barriers.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Noise Barriers.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 548 - PROHIBIT CONSTRUCTION TRAFFIC BEFORE 9AM AND AFTER 4PM.

Switzerland prohibits heavy motor vehicle driving at nights and on Sundays.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:

Prohibit Construction Traffic before 9am and after 4pm.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Prohibit Construction Traffic before 9am and after 4pm. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Prohibit Construction Traffic before 9am and after 4pm. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Prohibit Construction Traffic before 9am and after 4pm.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Prohibit Construction Traffic before 9am and after 4pm.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Prohibit Construction Traffic before 9am and after 4pm.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-
* 549 - TRUCKS USING JAKE BRAKES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Trucks Using Jake Brakes.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Eighteen wheel trucks have an additional form a braking called "Jake Brakes" which uses engine braking instead of wheel braking. It creates a loud, deep bubbling noise that is prohibited in many communities. These brakes are normally to prevent speed buildup when descending any kind of road.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of

Trucks Using Jake Brakes.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 550 - JAKE BRAKE PROHIBITION AND PENALTIES.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Jake Brake Prohibition and Penalties.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Jake Brake Prohibition and Penalties.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Jake Brake Prohibition and Penalties.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Jake Brake Prohibition and Penalties.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Jake Brake Prohibition and Penalties.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Jake Brake Prohibition and Penalties.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be

fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 551 - AIR HORN USE PROHIBITION AND PENALTIES.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:

Air Horn Use Prohibition and Penalties.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the

Primary mitigation measure:

Air Horn Use Prohibition and Penalties.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the
primary mitigation measure:
Air Horn Use Prohibition and Penalties.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the
primary mitigation measure: Air Horn Use Prohibition and Penalties.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please
identify as speculative or experimental the proposed mitigation measure:
Air Horn Use Prohibition and Penalties.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please
identify as speculative or experimental the proposed mitigation measure:
Air Horn Use Prohibition and Penalties.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 552 - GENERATOR NOISE IN QUIET AREAS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Generator Noise in Quiet Areas.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Many people choose to live in rural areas because of the quiet.
Electric generators can damage that quiet for 24 hours a day (all night long) and 365 days a year (including all holidays). Electrical generators are often found just beyond the end of electrical grid power delivery lines.

Generators can create loud (110 dBA at 15 feet) hydrocarbon (gasoline and diesel) power generators. MPWMD Safety Meeting Minutes Dec 22, 2000

The threshold of significance should be whether an objectionable noise can be heard beyond the limits of the minimum land area of its origin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Generator Noise in Quiet Areas.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 553 - BIRDS GENERAL.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Birds General.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

There are about 8600 bird species recognized as of 1961 (Encyc p 76) divided into 27 (Wetmore), 28 (Mayr & Amadon) or 51 (Stresemann) orders.

Birds play essential ecological roles as pollinators of flowers, dispersing seeds, and controlling insects.

Ranges of individual species are ordinarily sharply delimited. Encyclopedia of Biological Sciences, P. Gray, McGraw-Hill 1961

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Birds General.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
- 30 Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 554 - BIRD SONGS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Bird Songs.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- Bird songs are lost when songbird habitat is destroyed or degraded.
Almost any native forest overflows with bird songs, especially at
dawn and dusk. Urban areas - even urban parks almost never experience
the rich range of bird songs found in wild areas.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Bird Songs.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 555 - CALIFORNIA CONDOR (GYMNOGYPS CALIFORNIANUS).

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the project's potential impacts on
California Condor (*Gymnogyps californianus*).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a State and Federally listed Endangered species. Its range includes all of California. Monterey County is well within the range of this species. It roosts in large old trees including Redwood, Douglas fir and Monterey pine. Condors fly up to 15,000 feet above sea level.

Monterey County Range
In 1981 only 22 - 27 California condors were alive.
At their lowest ebb only 13 male and 14 female Condor's remained alive.
Condors were extirpated in Monterey County for 25 years but returned in 1996. Condors have been observed roosting in large Monterey pines (radiata) near Jacks Peak and flying at the mouth of Carmel Valley in 1998.

Condors feed on deer which are frequently killed on local roads and highways. The Condors could be killed feeding on the proposed freeway's roadkill.

The Condor declined in part because of lead poisoning. The Condors eat animals which have been shot with lead bullets.

Seven Condors have been killed in power line collisions since captive bred condors were released to the wild in 1992.

At least one condor died as a result of drinking water containing antifreeze.

The Condor declined in part because of DDT.

Many Ranches in Monterey County performed "Cattle Dipping" prior to the 1960's in which cows were led through a trench filled with DDT and Toxaphene. These areas are now hazardous waste sites. Markham Ranch is one example

"DDT is being preserved in soils all over California."
"DDT has been found in moderate to high concentrations in the Salinas River and lower Moss Landing watershed for many years."
DDT in the Salinas Valley, 1986, California Water Resources Control Board Report # 86-2-WQ.

Moss Landing Harbor has high concentrations of DDT in its harbor bottom which is now being stirred up by dredging.

The Pajaro River, bordering Monterey and Santa Cruz Counties, has high levels of DDT.

The lower fifty (50) miles of the Salinas River (Hydro Unit # 309.100) is on the US EPA's CWA 303(d) list for Pesticide contamination exceeding TMDL limits. The pesticides come from Agriculture, Irrigated Crop production, Agriculture-storm runoff, Agriculture-irrigation tailwater, Agriculture Return flows, and non-point source pollution.

In 1996 2,193 fish consumption advisories were issued in 48 states.
Mercury, PCBs, chlordane, dioxin and DDT were responsible for almost all fish consumption advisories in 1996. -EPA Administrator, Carol Browner and Secretary, Dept of Agriculture Dan Glickman Feb 14th 1998 in Report called the "Clean Water Action Plan" to Vice President Al Gore.
"Predatory organisms at the top of the food web generally have higher mercury concentrations." Mercury Study Report to Congress Dec 1997

None of this should come as a surprise to the US-EPA because DDT is still in use worldwide and to some degree in the U.S - in spite of the so-called "ban." Up to 15% of a pesticide can be DDT which is still allowed by EPA and FIFRA as an "impurity" in insecticides including chlorobenilate and dicofol. (Living in the Environment, G Tyler Miller pg 627)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Condor (*Gymnogyps californianus*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 556 - CALIFORNIA CONDOR (GYMNOGYPS CALIFORNIANUS) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
California Condor (*Gymnogyps californianus*) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Condor (*Gymnogyps californianus*) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 557 - BALD EAGLES (HALIAEETUS LEUCOCEPHALUS).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Bald Eagles (*Haliaeetus leucocephalus*).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This is a Federally listed Threatened species and was state and federally listed as Endangered. Its range includes all of California. Monterey County is well within the range of this species. It was extirpated in Monterey County for 60 years but returned in 1986. There were once nesting pairs in Lafler & Torre Canyons in Big Sur in the 1930s. It was extirpated in Monterey County for 60 years but returned in 1986. "A single subadult was observed at Moore's Lake on Rancho San Carlos in 1991." Rancho San Carlos FEIR pg 11-25 1995 They are often observed roosting at Point Lobos State Park. Eagles fly up to 15,000 feet above sea level.

The Bald Eagle declined because of DDT. In 1940, the Bald Eagle Protection Act was passed. This law made it illegal to kill, harm, harass, or possess bald eagles, alive or dead, including eggs, feathers and nests. However, the decline continued until DDT was banned from use in the United States on December 31, 1972.

Many Ranches in Monterey County performed "Cattle Dipping" prior to the 1960's in which cows were led through a trench filled with DDT and Toxaphene. These areas are now hazardous waste sites. Markham Ranch is one example

Moss Landing Harbor has high concentrations of DDT in its harbor bottom which is now being stirred up by dredging.

The Pajaro River, bordering Monterey and Santa Cruz Counties, has high levels of DDT. (Pajaro River Management Plan 1999)

In 1996 2,193 fish consumption advisories were issued in 48 states. Mercury, PCBs, chlordane, dioxin and DDT were responsible for almost all fish consumption advisories in 1996. -EPA Administrator, Carol Browner and Secretary, Dept of Agriculture Dan Glickman Feb 14th 1998 in Report called the "Clean Water Action Plan" to Vice President Al Gore. "Predatory organisms at the top of the food web generally have higher mercury concentrations." Mercury Study Report to Congress Dec 1997

None of this should come as a surprise to the US-EPA because DDT is still in use worldwide and to some degree in the U.S. - in spite of the so-called "ban." Up to 15% of a pesticide can be DDT which is still allowed by EPA and FIFRA as an "impurity" in insecticides including chlorobenilate and dicofol. (Living in the Environment, G Tyler Miller pg 627)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Bald Eagles (*Haliaeetus leucocephalus*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it

vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 558 - BALD EAGLES (HALIAEETUS LEUCOCEPHALUS) HABITAT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the project's potential impacts on Bald Eagles (Haliaeetus leucocephalus) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Bald Eagles (Haliaeetus leucocephalus) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.	37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.	QUANTIFICATION OF BASELINES AND IMPACTS:
16. Please quantify the length of time this impact would last.	38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.	This impact appears to be potentially significant.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.	39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.	1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Golden Eagle (Aquila chrysaetos).
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.	40. Please state whether the margin of error is measured or assumed.	1b. If no objective criteria are used please state that clearly.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.	41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.	2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
20a. Please state whether this MARGIN of ERROR is measured or assumed.	42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.	3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
20b. If no margin of error is used please state that clearly.	43. Please name each EXPERT who prepared and reviewed this impact.	3b. Please quote the definition used.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.	44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.	4. If no measurement units are used please state that clearly.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.	45. Please provide AVOIDANCE MITIGATION for this impact.	5a. Please state the METHOD of measurement used to determine the significance for each criteria.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	46. Please provide the reverse of this impact as Mitigation.	5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
24. Please state whether the MARGIN of ERROR is measured or assumed.	47. Please provide an ALTERNATIVE which avoids this impact.	6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.	48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.	7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	* 559 - GOLDEN EAGLE (AQUILA CHRYSAETOS).	8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
27. Please state whether the MARGIN of ERROR is measured or assumed.	The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the project's potential impacts on Golden Eagle (Aquila chrysaetos).	9. Please state the variance's MARGINS of ERROR or confidence level.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.	If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.	10. Please state whether this MARGIN of ERROR is measured or assumed.
29. Please list all potential CUMULATIVE impacts related to this one.	This species is listed as "fully protected" in California by CDF&G and is a Species of Special Concern.	11. If an average is used, please state which kind of average.
30 Please describe all potential CUMULATIVE impacts related to this one.	This bird inhabits grassland and savanna habitats in hilly and mountainous terrain. Their population declines are due in part to loss of habitat from urban and agricultural development.	12. Please state the most extreme values which could be encountered.
31. Please quantify all potential CUMULATIVE impacts related to this one.	A family nests in and near Point Lobos State park.	13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
32. Please list, describe and quantify all potential compound and synergetic impacts.	One was observed in 1994 flying above San Juan Rd in Carmel Woods heading towards Jeffers' forest in Pebble Beach.	14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
33. Please list, describe and quantify all Construction impacts related to this one.	A pair were observed regularly in 1990 near the end of Pesante road.	15. Please provide a graph of HISTORICAL measurements.
34. Please list, describe and quantify all Growth impacts related to this one.	A pair nest regularly on Elkhorn Ranch near Elkhorn Slough.	16. Please quantify the length of time this impact would last.
35. Please list, describe and quantify all Indirect impacts related to this one.	An Adult and two juveniles were observed roosting in oak trees on the Rancho San Juan project site in August 1995. Ideal foraging habitat is present throughout Monterey County annual grasslands.	17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.		18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
		19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
		20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 560 - GOLDEN EAGLE (AQUILA CHRYSAETOS) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Golden Eagle (Aquila chrysaetos) Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Golden Eagle (Aquila chrysaetos) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 561 - MARBLED MURRELET (BRACHYRAMPHUS MARMORATUS).

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on
Marbled Murrelet (*Brachyramphus marmoratus*).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a California listed Endangered species and a Federally listed
Threatened species. Monterey County includes the southern end of the
range of this species. It is also protected from "take" by the
Migratory
Bird Treaty Act.

HOME
It nests in trees up to 150 in height.

NUMBERS

"Population numbers are difficult to estimate for this enigmatic bird,
but there are probably about 1,000 birds in the [Monterey Bay]
population." MBNMS Ecosystem Observations, 2001

LOCATION

"The Santa Cruz Mountains Zone extends from the mouth of San Francisco
Bay to Point Sur, Monterey County. It includes waters within 2
kilometers of the Pacific Ocean shoreline, the waters of Monterey bay,
and extends inland a distance of up to 24 kilometers from the Pacific
Ocean shoreline. Because this population is small and isolated from
other Marbled Murrelet populations, it is considered to be especially
vulnerable. Marbled Murrelet probably once nested on the Monterey County
Coast from south of Carmel through Big Sur. In addition, numbers of
Marbled Murrelets are found in Monterey Bay during the winter."

The first Marbled Murrelet was seen in the Santa Cruz Mountains in 1974.
In 1997? some were found "near Pt. Piedras Blancas" near the southern
Monterey County line. MBNMS Ecosystem Observations, 2001

THREATS

"Marbled Murrelets have been killed by gill nets" (US-FWS MM Recovery
Plan 1997). "Even very small oil spills have resulted in the death of
large numbers of, perhaps large proportions of local populations, of
Marbled Murrelets. Smaller incidents of oil discharge, such as those
associated with the cleaning of bilges and oil tanks at sea, can
cumulatively result in significant mortality to Marbled Murrelets."

"The loss of nesting habitat appears to be the primary cause of marbled
murrelet population declines in Washington, Oregon and California. The
low reproductive potential of this species, and the lack of knowledge
concerning its ability to locate and reestablish new nesting areas
after elimination of nesting habitat, makes it imperative to maintain
all occupied nesting habitat." - MM Recovery Plan 1997 (FWS ?)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Marbled Murrelet (*Brachyramphus marmoratus*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

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* 562 - MARBLED MURRELET (BRACHYRAMPHUS MARMORATUS) HABITAT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the project's potential impacts on Marbled Murrelet (Brachyramphus marmoratus) Habitat.

If you claim the document contains proof of no-significant-impact for

this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Marbled Murrelet (*Brachyramphus marmoratus*) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 563 - NORTHERN SPOTTED OWL (*STRIX OCCIDENTALIS CAURINA*).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Northern Spotted Owl (*Strix occidentalis caurina*).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This is a Federally listed Threatened species. Monterey County includes the southern end of the range of this species. They are known to nest, roost and feed in a variety of different kinds of forest. Most observations of spotted owl habitat use have been made in mature old-growth forests. (US-FWS Dec 1992)

The red tree vole is a primary food source for the Spotted Owl.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Northern Spotted Owl (*Strix occidentalis caurina*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 564 - NORTHERN SPOTTED OWL (STRIX OCCIDENTALIS CAURINA) HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Northern Spotted Owl (*Strix occidentalis caurina*) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance on Northern Spotted Owl (*Strix occidentalis caurina*) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 565 - CALIFORNIA SPOTTED OWL (STRIX OCCIDENTALIS).**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
California Spotted Owl (*Strix occidentalis*).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a Species of Special Concern.
"The spotted owl, a very rare species elsewhere in the west is fairly common in old growth forests in Big Sur." The Natural History of Big Sur, Henson & Usner, 1993 UC Press. In 1991 three probable breeding pairs were detected in, among other places, Van Winkley's Canyon, Williams Canyon and along lower San Clemente Creek; unmated males were found along upper San Jose Creek and along Potrero Creek. Rancho San Carlos FEIR pg 11-30 1995 Spotted Owls have been documented foraging around the upper fringes of the Arroyo Seco Campground. (Forest Service ltr to FHWA Aug 9 1994)

There are about 30 nesting pairs of Spotted Owls in Monterey County as of 2003. -SPCA Press release, Nov 2003

The red tree vole is a primary food source for the Spotted Owl.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Spotted Owl (*Strix occidentalis*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 566 - CALIFORNIA SPOTTED OWL (STRIX OCCIDENTALIS) HABITAT.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
California Spotted Owl (*Strix occidentalis*) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Spotted Owl (*Strix occidentalis*) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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9. Please state the variance's MARGINS of ERROR or confidence level.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

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15. Please provide a graph of HISTORICAL measurements.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 567 - GREAT GRAY OWL (*STRIX NEBULOSA*).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Great Gray Owl (*Strix nebulosa*).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This is a California listed Endangered species.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Great Gray Owl (*Strix nebulosa*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.
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 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
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 23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
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 25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
 26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 27. Please state whether the MARGIN of ERROR is measured or assumed.
 28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
 29. Please list all potential CUMULATIVE impacts related to this one.
 30. Please describe all potential CUMULATIVE impacts related to this one.
 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergetic impacts.
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 43. Please name each EXPERT who prepared and reviewed this impact.
 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.
- ENDANGERED SPECIES**
This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.
- SPECIES RANGE**
1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg 4-16/4-17.
- LOCAL OBSERVATIONS**
2. Please provide a map of this species' habitat, local to the project.
 3. Please identify all recent observations of the species on the local habitat map.
 4. Please describe whether the population(s) affected by this project is a source or a sink population.
- HABITAT TYPES AND RANGE**
5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.
6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.
- MINIMUM VIABLE POPULATION**
7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.
8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.
9. What margin of error do these numbers have?
10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.
- VULNERABILITY AND THREATS**
11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).
12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).
- ONSITE HABITAT SIZE & QUALITY**
13. Please quantify and describe the species maximum potential onsite habitat size in acres.
14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.
15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.
16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.
- FOOD CHAIN**
17. Please describe and quantify the food chain for this species
18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be

impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 568 - GREAT GRAY OWL (STRIX NEBULOSA) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Great Gray Owl (Strix nebulosa) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Great Gray Owl (Strix nebulosa) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 569 - ELF OWL (MICRATHENE WHITNEYI).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Elf Owl (Micrathene whitneyi).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a California listed Endangered species.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Elf Owl (Micrathene whitneyi).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 570 - ELF OWL (MICRATHENE WHITNEYI) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Elf Owl (*Microathene whitneyi*) Habitat.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Elf Owl (*Microathene whitneyi*) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 571 - WESTERN SNOWY PLOVER (CHARADRIUS ALEXANDRINUS NIVOSUS).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Western Snowy Plover (*Charadrius alexandrinus nivosus*).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This is a Federally listed Threatened species as of March 5 1993 (58 FFR 12864) . Monterey County is well within its range. "Fewer than 1500 breeding birds remain on the Pacific Coast." "There are only 20 nesting sites left in California." FWS, 1998

They nest on sandy beaches including Point Sur, Carmel River mouth, Asilomar Beach, near Monterey Beach Hotel, the Naval Postgraduate School, Salinas River mouth, Pajaro River mouth, in the salt drying ponds in Elkhorn Slough.

Predators include unleashed dogs, development, Peregrine Falcons, Shrikes, Horses, Raccoons, cats, red foxes. Critical habitat was designated by FWS on Dec 7 1999 for the beaches at Point Sur, Seaside & Monterey Salinas River mouth, Pajaro River mouth, and the salt drying ponds in Elkhorn Slough.

The Western Snowy Plover is "known to exist in Pacific Grove, approximately one mile from the project site." DEIR, Rohr Hotel, 1983, Citing California Natural Diversity Database, 1981

"In winter the number of Snowies in Monterey County swells to about 300 birds (... 80 in the Monterey Dunes from Del Monte Beach to Asilomar Beach and the Carmel River Mouth)." Monterey County Breeding Bird Atlas, 1993

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Western Snowy Plover (*Charadrius alexandrinus nivosus*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is

a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and

losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 572 - WESTERN SNOWY PLOVER (CHARADRIUS ALEXANDRINUS NIVOSUS) HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Western Snowy Plover (*Charadrius alexandrinus nivosus*) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Western Snowy Plover (*Charadrius alexandrinus nivosus*) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 573 - SAMUEL'S SONG SPARROW (MELOSPIZA MELODIA SAMUELIS).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Samuel's Song Sparrow (*Melospiza melodia samuelis*).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Samuel's Song Sparrow is "known to exist in Pacific Grove, approximately one mile from the project site." DEIR, Rohr Hotel, 1983, Citing California Natural Diversity Database, 1981

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Samuel's Song Sparrow (*Melospiza melodia samuelis*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single

breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

*** 574 - SAMUEL'S SONG SPARROW (MELOSPIZA MELODIA SAMUELIS) HABITAT.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Samuel's Song Sparrow (*Melospiza melodia samuelis*) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Samuel's Song Sparrow (*Melospiza melodia samuelis*) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 575 - WESTERN GOSHAWK.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Western Goshawk.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This species was federally listed during a 90 day rule. Monterey County is well within its range. They nest in old growth forests.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Western Goshawk.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 576 - WESTERN GOSHAWK HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Western Goshawk Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Western Goshawk Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 577 - AMERICAN PEREGRINE FALCON (FALCO PEREGRINUS ANATUM).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
American Peregrine Falcon (Falco peregrinus anatum).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a State listed Endangered species. It was listed and Federally
until 1999. It is specially protected under California Law: Calif
Fish &
Game Code 3503.5.

"It is unlawful to take, possess, or destroy any birds in the orders
Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or
destroy the nest or eggs of any such bird except as
otherwise provided
by this code or any regulation adopted pursuant thereto."

In 1970 there were only ten pairs known (20 birds) in the
entire U.S.
This is a severe genetic bottleneck.

Its range includes coastal Monterey County. Monterey County is well within the range of this species. It formerly nested throughout California, primarily along the coast and around the Channel Islands.
They occur near marshes, lakes, and rivers that support an abundance of birds (to prey upon). Coastal and Inland marsh habitats are especially important in fall and winter, when they attract large concentrations of water birds.

A pair have been observed hunting from the tower near the Monterey Bay Aquarium in 1999.
A pair may be nesting at the Embassy Suites in Seaside in Dec 1999.

There are about 7 non-migratory pairs living in Monterey County in 2004.

It likes protected ledges, caves and potholes on cliffs for nesting.
It prefers cliffs that overlook rivers, lakes or the ocean.
It nests along the Big Sur coastline. (near Hurricane Pt.)
It is a regular winter visitor at Elkhorn Slough and Lake San Antonio.
-Salinas Valley Saltwater Intrusion Project DEIR/S Technical Appendices

Dec 1990 A single individual was observed in 1991 at Rancho San Carlos.
Rancho San Carlos FEIR pg 11-25 1995

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
American Peregrine Falcon (Falco peregrinus anatum).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.
 11. If an average is used, please state which kind of average.
 12. Please state the most extreme values which could be encountered.
 13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
 14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20a. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
 23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 24. Please state whether the MARGIN of ERROR is measured or assumed.
 25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
 26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 27. Please state whether the MARGIN of ERROR is measured or assumed.
 28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
 29. Please list all potential CUMULATIVE impacts related to this one.
 30. Please describe all potential CUMULATIVE impacts related to this one.
 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergetic impacts.
 33. Please list, describe and quantify all Construction impacts related to this one.
 34. Please list, describe and quantify all Growth impacts related to this one.
 35. Please list, describe and quantify all Indirect impacts related to this one.
 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
 37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
 38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
 39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
 40. Please state whether the margin of error is measured or assumed.
 41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
 42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
 43. Please name each EXPERT who prepared and reviewed this impact.
 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.
- ENDANGERED SPECIES**
This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.
- SPECIES RANGE**
1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.
- LOCAL OBSERVATIONS**
2. Please provide a map of this species' habitat, local to the project.
3. Please identify all recent observations of the species on the local habitat map.
 4. Please describe whether the population(s) affected by this project is a source or a sink population.
- HABITAT TYPES AND RANGE**
5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.
6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.
- MINIMUM VIABLE POPULATION**
7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.
8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.
9. What margin of error do these numbers have?
10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.
- VULNERABILITY AND THREATS**
11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).
12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).
- ONSITE HABITAT SIZE & QUALITY**
13. Please quantify and describe the species maximum potential onsite habitat size in acres.
14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.
15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.
16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.
- FOOD CHAIN**
17. Please describe and quantify the food chain for this species
18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 578 - AMERICAN PEREGRINE FALCON (FALCO PEREGRINUS ANATUM) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
American Peregrine Falcon (Falco peregrinus anatum)
Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
American Peregrine Falcon (Falco peregrinus anatum)
Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 579 - CALIFORNIA BROWN PELICAN (PELECANUS OCCIDENTALIS CALIFORNICUS).**

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on

California Brown Pelican (*Pelecanus occidentalis californicus*).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This is a State and Federally listed Endangered species. Monterey County is well within its range. It is also protected under the Marine Mammal Protection Act. Its habitat includes the near shore waters and air of California. A large roost has been established at Moss Landing. Nests occur at Point Lobos.

The Pelican declined because of DDT harming among other things its eggs.

Many Ranches in Monterey County performed "Cattle Dipping" prior to the 1960's in which cows were led through a trench filled with DDT and Toxaphene. These areas are now hazardous waste sites. Markham Ranch is one example

Moss Landing Harbor has high concentrations of DDT in its harbor bottom which is now being stirred up by dredging. Pelicans roost at Moss Landing.

The Pajaro River, bordering Monterey and Santa Cruz Counties, has high levels of DDT.

In 1996 2,193 fish consumption advisories were issued in 48 states. Mercury, PCBs, chlordane, dioxin and DDT were responsible for almost all fish consumption advisories in 1996. -EPA Administrator, Carol Browner and Secretary, Dept of Agriculture Dan Glickman Feb 14th 1998 in Report called the "Clean Water Action Plan" to Vice President Al Gore. "Predatory organisms at the top of the food web generally have higher mercury concentrations." Mercury Study Report to Congress Dec 1997

None of this should come as a surprise to the US-EPA because DDT is still in use worldwide and to some degree in the U.S. - in spite of the so-called "ban." Up to 15% of a pesticide can be DDT which is still allowed by EPA and FIFRA as an "impurity" in insecticides including chlorobenilate and dicofol. (Living in the Environment, G Tyler Miller pg 627)

California Brown Pelicans are particularly susceptible to oil spills because of their natural attraction to oil slicks. Some experts theorize the Pelicans think the shiny slicks are schools of fish and plunge right

in. Herald, Jun 15, 00

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Brown Pelican (*Pelecanus occidentalis californicus*).

1b. If no objective criteria are used please state that clearly.

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12. Please state the most extreme values which could be encountered.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

-
* 580 - CALIFORNIA BROWN PELICAN (PELECANUS OCCIDENTALIS CALIFORNICUS) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on California Brown Pelican (Pelecanus occidentalis californicus) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Brown Pelican (Pelecanus occidentalis californicus) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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* 581 - LEAST BELL'S VIREO (VIREO BELLII PUSILLUS).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Least Bell's Vireo (Vireo bellii pusillus).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a State and Federally listed Endangered species. Its northern range includes Monterey County. It nests in riparian areas with dense willow thickets. It has been observed nesting along the Salinas River near Bradley.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Least Bell's Vireo (Vireo bellii pusillus).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows

whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and

potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 582 - LEAST BELL'S VIREO (VIREO BELLII PUSILLUS) HABITAT.

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on
Least Bell's Vireo (Vireo bellii pusillus) Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Least Bell's Vireo (Vireo bellii pusillus) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 583 - SWAINSON'S HAWK (BUTEO SWAINSONI).

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on
Swainson's Hawk (Buteo swainsoni).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a California listed Threatened species.
An estimated 20,000 Swainson's Hawk's were killed in Argentina in 1995/1996 after eating grasshoppers contaminated with the OP monocrotophos. Leg bands indicated the birds came from the US and Canada. "Disrupting the Balance" 1999 pg 40

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Swainson's Hawk (Buteo swainsoni).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the

equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 584 - SWAINSON'S HAWK (BUTEO SWAINSONI) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Swainson's Hawk (Buteo swainsoni) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Swainson's Hawk (Buteo swainsoni) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 585 - CALIFORNIA CLAPPER RAIL(RALLUS LONGIROSTRIS OBSOLETE??).

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on California Clapper Rail(Rallus Longirostris Obsolete??).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This bird is Federally and California listed as Endangered. Its range includes Monterey County.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Clapper Rail(Rallus Longirostris Obsolete??).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 586 - CALIFORNIA CLAPPER RAIL(RALLUS LONGIROSTRIS OBSOLETE??) HABITAT.

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on California Clapper Rail(Rallus Longirostris Obsolete??) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Clapper Rail(Rallus Longirostris Obsolete??) Habitat.

- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 587 - CALIFORNIA BLACK RAIL.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on California Black Rail.
- If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
- This is a California listed Threatened species and a Federal Species of Special Concern.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Black Rail.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
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10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 588 - CALIFORNIA BLACK RAIL HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on California Black Rail Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Black Rail Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Bank Swallow (*Riparia riparia*).

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

This is a California listed Threatened species. For breeding they can
use vertical banks and cliffs with fine-textured soils near streams,
rivers, lakes, or the ocean.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Bank Swallow (*Riparia riparia*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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10. Please state whether this MARGIN of ERROR is measured or assumed.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

* 589 - BANK SWALLOW (*RIPARIA RIPARIA*).

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 590 - BANK SWALLOW (RIPARIA RIPARIA) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Bank Swallow (Riparia riparia) Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Bank Swallow (Riparia riparia) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

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18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 591 - (SOUTHWESTERN) WILLOW FLYCATCHER (EMPIDONAX TRAILLII EXTIMUS).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
(Southwestern) Willow Flycatcher (Empidonax traillii extimus).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This is a Federally listed Endangered species as of 3-29-95
This is a California listed Endangered species. Its habitat includes California riparian areas, especially those dominated by willows. It was observed nesting near Spreckels from 1969 to 1972 and at the Carmel River mouth in 1974 "Good habitat remains from at least Bradley to the San Luis Obispo County line." Monterey County Breeding Bird Atlas, 1993

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on (Southwestern) Willow Flycatcher (*Empidonax traillii extimus*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 592 - (SOUTHWESTERN) WILLOW FLYCATCHER (EMPIDONAX TRAILLII EXTIMUS) HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on (Southwestern) Willow Flycatcher (*Empidonax traillii extimus*) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on (Southwestern) Willow Flycatcher (*Empidonax traillii extimus*) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 593 - WHITE TAILED KITE (ELANUS LEUCURUS).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on White Tailed Kite (Elanus leucurus).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This species is listed as "fully protected" in California by CDF&G. Nesting has been confirmed around the Elkhorn Slough area. It has been observed in an oak tree in the center of the Rancho San Juan project on August 30 1995. Two nests of the right size were observed there as well but they were not confirmed as White tailed Kite nests.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on White Tailed Kite (Elanus leucurus).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 594 - WHITE TAILED KITE (ELANUS LEUCURUS) HABITAT.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
White Tailed Kite (Elanus leucurus) Habitat.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
White Tailed Kite (Elanus leucurus) Habitat.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 595 - COOPER'S HAWK (ACCIPTER COOPERI).

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the project's potential impacts on
Cooper's Hawk (Accipter cooperi).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This bird is listed as a Species of Special Concern by CDFG. It breeds in oak woodlands and deciduous riparian areas. It was observed on Aug 30 1995 in the Salinas Valley.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Cooper's Hawk (Accipter cooperi).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 596 - COOPER'S HAWK (ACCIPITER COOPERI) HABITAT.**

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on Cooper's Hawk (Accipiter cooperi) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Cooper's Hawk (Accipiter cooperi) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 597 - FERRUGINOUS HAWK (BUTEO REGALIS).**

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on Ferruginous Hawk (Buteo regalís).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This bird is listed as a Species of Special Concern by CDFG. it winters

in arid and semi-arid areas of California. Two were observed roosting on the Rancho San Juan project site on August 31 1995. Grasslands of that site provide ideal winter foraging habitat for the species.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Ferruginous Hawk (*Buteo regalis*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 598 - FERRUGINOUS HAWK (BUTEO REGALIS) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Ferruginous Hawk (*Buteo regalis*) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Ferruginous Hawk (*Buteo regalis*) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 599 - MERLIN (FALCO COLUMBARIUS).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Merlin (Falco columbarius).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This small falcon is listed as a Species of Special Concern by CDFG. It winters in grasslands, savannas and other open habitats throughout California.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Merlin (Falco columbarius).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 600 - MERLIN (FALCO COLUMBARIUS) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Merlin (Falco columbarius) Habitat.

If you claim the document contains proof of no-significant-impact for
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* 601 - GREAT HORNED OWL.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Great Horned Owl.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

A breeding pair of Great Horned Owls need about 2 square kilometers of
habitat. (Breeding Bird Atlas of Monterey County, 1993)
At least one pair lives in Jeffers' forest in Pescadero Canyon in Pebble
Beach.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Great Horned Owl.

1b. If no objective criteria are used please state that clearly.

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*** 602 - GREAT HORNED OWL HABITAT.**

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on Great Horned Owl Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Great Horned Owl Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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*** 603 - PALLID BAT (ANTROZOUS PALLIDUS).**

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on Pallid Bat (*Antrozous pallidus*).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Species of Special Concern. In 1991, 6 individuals foraged exclusively in forested areas in oak woodlands north and south of ranch house at Rancho San Carlos or in riparian areas of Las Garzas and Salsipuedes creeks, also near Moore's lake. Rancho San Carlos FEIR pg 11-25 1995

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Pallid Bat (*Antrozous pallidus*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,

credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the

baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 604 - PALLID BAT (ANTROZOUS PALLIDUS) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Pallid Bat (Antrozous pallidus) Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Pallid Bat (Antrozous pallidus) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 605 - YUMA BAT (MYOTIS YUMANENSIS).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Yuma Bat (Myotis Yumanensis).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Federal Watch list.
It inhabits dead trees, under peeled bark on trees, under palmfronds, in
abandoned buildings in Monterey County.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Yuma Bat (Myotis Yumanensis).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 606 - WESTERN SMALL-FOOTED BAT (MYOTIS CILIOLABRUM).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Western Small-footed bat (*Myotis ciliolabrum*).

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Federal Watch list.

It inhabits dead trees, under peeled bark on trees, under palmfronds, in abandoned buildings in Monterey County.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Western Small-footed bat (*Myotis ciliolabrum*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 607 - LONG LEGGED BAT (MYOTIS VOLANS).**

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of

Long legged bat (Myotis volans).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Federal Watch list.

California Species of Special Concern.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Long legged bat (Myotis volans).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 608 - FRINGED BAT (MYOTIS THYSANODES).**

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of

Fringed Bat (Myotis thysanodes).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Federal Watch list. California Species of Special Concern.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Fringed Bat (*Myotis thysanodes*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 609 - WESTERN LONG-EARED BAT (*MYOTIS EVOTIS*).

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of Western long-eared bat (*Myotis evotis*).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Federal Watch list.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Western long-eared bat (*Myotis evotis*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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15. Please provide a graph of HISTORICAL measurements.
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18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
- 30 Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 610 - TOWNSENDS BIG-EARED BAT (CORYNORHINUS TOWNSENDII).
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Townsend's big-eared bat (Corynorhinus townsendii).
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- Federal Watch list. California Species of Special Concern.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective
- (non-subjective) CRITERIA used to determine the impact significance of
Townsend's big-eared bat (Corynorhinus townsendii).
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 611 - WESTERN MASTIFF BAT (EUMOPS PEROTIS).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Western mastiff bat (Eumops perotis).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Federal Watch list. California Species of Special Concern.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Western mastiff bat (Eumops perotis).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 612 - WESTERN RED BAT (LASIURUS BELOSSEVILLII).

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Western Red bat (Lasiurus belossevillii).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

California Species of Special Concern.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Western Red bat (Lasiurus belossevillii).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 613 - ARTHROPODS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Arthropods.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Temperate Forest soil and litter layers may contain the greatest numbers of species and densities of arthropods in the world." A square yard of undisturbed forest soil can contain 250 species of beetles, flies, bugs, mites, millipedes, centipedes and sow bugs."
"The Status and Trends of Our Nation's Biological Resources" by USGS

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Arthropods.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 614 - SMITH'S BLUE BUTTERFLY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Smith's Blue Butterfly.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This is a Federally listed Endangered species since June 1 1976 (41 FR 22044). (*Euphilotes enoptes smithi*) Monterey County lies within the center of the natural range of this species. Monterey County is well within the range of this species. It has been found at the mouth of the Salinas River. Critical Habitat had not been designated as of March 1999.

This butterfly is a subspecies found in some 25 localities within the coastal fog belt of Monterey and Santa Cruz Counties. It is found almost exclusively on two species of wild buckwheat: *Eriogonum latifolium* (Coast Buckwheat), which occurs on coastal sand dunes and bluffs, and *E. parvifolium* (Seacliff Buckwheat), which occurs on dunes, bluffs, and chapparal-covered hillsides away from the immediate coast.

-Salinas Valley Saltwater Intrusion Project DEIR/S Technical Appendices
Dec 1990

"One of these two plant species must be present for Smith's Blue Butterfly to occur in Coastal Dun habitat." FWS Biological Opinion for Former Fort Ord, March 1999.

The butterflies lay their eggs exclusively in the buckwheat species mentioned above.

The Smith's Blue Butterfly is a weakly flying species and long distance dispersal is believed to occur only rarely. They have been observed dispersing up to a few hundred yards at Fort Ord and at Marina State Beach. FWS Biological Opinion for Former Fort Ord, March 1999.

THREATS

"Freeway building and urbanization have destroyed roughly 50 percent of the original dunes." The butterfly only lives for about a week, needs areas sheltered from winds. The population is active from early June to September. Most fly less than 200 feet from where their lives began as eggs. Roadways are barriers that may isolate their colonies from each other. Highway 1 in Sand City, built right through the middle of critical butterfly habitat, creates one such barrier. Cars traveling at 65 miles per hour pose a lethal threat. - Monterey Dunes History Assoc Newsletter, Summer 1999

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Smith's Blue Butterfly.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

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9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a

specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 615 - SMITH'S BLUE BUTTERFLY HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Smith's Blue Butterfly Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Smith's Blue Butterfly Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 616 - BAY CHECKERSPOT BUTTERFLY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Bay Checkerspot Butterfly.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a Federally listed Threatened species which lives in Monterey County.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Bay Checkerspot Butterfly.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies

do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 617 - BAY CHECKERSPOT BUTTERFLY HABITAT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the project's potential impacts on Bay Checkerspot Butterfly Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Bay Checkerspot Butterfly Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.
 10. Please state whether this MARGIN of ERROR is measured or assumed.
 11. If an average is used, please state which kind of average.
 12. Please state the most extreme values which could be encountered.
 13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
 14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
 22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
 23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 24. Please state whether the MARGIN of ERROR is measured or assumed.
 25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
 26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
 27. Please state whether the MARGIN of ERROR is measured or assumed.
 28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
 29. Please list all potential CUMULATIVE impacts related to this one.
 - 30 Please describe all potential CUMULATIVE impacts related to this one.
 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergetic impacts.
 33. Please list, describe and quantify all Construction impacts related to this one.
 34. Please list, describe and quantify all Growth impacts related to this one.
 35. Please list, describe and quantify all Indirect impacts related to this one.
 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
 37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
 38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
 39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
 40. Please state whether the margin of error is measured or assumed.
 41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
 42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
 43. Please name each EXPERT who prepared and reviewed this impact.
 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 618 - MONARCH BUTTERFLY (DANAUS PLEXIPPUS).
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Monarch Butterfly (Danaus plexippus).
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- Monarch Butterfly (Danaus plexippus) is a California Department of Fish and Game species of special concern. Monarch migration is designated a "Threatened Natural Phenomenon" by the International Union for the Conservation of Nature and natural Resources.
- The USDA prohibits shipping Monarchs across the Continental Divide to keep the populations separate.
- The Monarch is specifically protected in the City of Pacific Grove, CA with a \$500 fine for killing one.
- It migrates from the Pacific Northwest to the central Mexico highlands roosting in Monterey Pine forests in Pacific Grove and Santa Cruz along the way. They eat milkweed (Asclepias sp.) which makes them toxic to birds.
- Uncontrolled Oyamel pine forest wood cutting west of Mexico city is endangering critical Monarch Butterfly habitat.
- Monarch caterpillars can be killed by the pollen from Monsanto's bioengineered "Bt corn ." Scientific American Aug 99 pg 28
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Monarch Butterfly (Danaus plexippus).
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
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31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
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45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 619 - MONARCH BUTTERFLY (DANAUS PLEXIPPUS) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Monarch Butterfly (Danaus plexippus) Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Monarch Butterfly (Danaus plexippus) Habitat.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
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4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
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6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 620 - BEES.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Bees.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

There are some 3,500 bee species in the U.S. Bees pollinate at least 95 crops in the U.S with a value of some \$10 billion per year.

"There are some 1500 species of bees in California and some 200 to 250 species in Carmel Valley. Solitary bees make up the majority of the bee family. Bee populations are suffering from widespread use of pesticides and conversion of land to urban or agricultural use. Drought makes their populations drop precipitously." Gordon Frankie, UC Berkeley Entomologist and conservation biologist with the Division of Insect Biology.

"Insecticides can kill bees outright or it can be carried back to the hive where it can kill the brood bees or adult bees." Eric Mussen, UC Davis Entomology Department.

"Honeybees are beneficial insects that are particularly vulnerable to insecticides." Environmental Science; Morgan, Moran & Weirsm; W.C. Brown Pub. 1993 p 178

Most bee foraging occurs within 2 - 3 miles of the hive, but can be up to 5 miles during times of pollen or nectar shortages.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Bees.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 621 - BEES HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Bees Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance on
Bees Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 622 - HAY OR STRAW BALES USED TO REDUCE STREAM SILTATION.

Reducing Stream Siltation with Hay or Straw Bales can prevent fish passage.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Hay or Straw Bales used to Reduce Stream Siltation.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Hay or Straw Bales used to Reduce Stream Siltation. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Hay or Straw Bales used to Reduce Stream Siltation. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Hay or Straw Bales used to Reduce Stream Siltation.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the

mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Hay or Straw Bales used to Reduce Stream Siltation.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Hay or Straw Bales used to Reduce Stream Siltation.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 623 - WEST COAST STEELHEAD (ONCORHYNCHUS MYKISS).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
West Coast Steelhead (*Oncorhynchus mykiss*).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This species was Federally listed as Threatened and Endangered on August 18 1997 [62 FR 43937]. Monterey County is well within the range of this species. Its range includes all rivers and most streams in Monterey

County including the Big Sur River, Salinas River, Carmel River, Potrero Creek, Robinson Canyon Creek, Garzas Creek, San Clemente Creek, San Jose Creek.

Steelhead typically spawn and rear in the headwaters and tributaries of rivers, rather than in the mainstems. The ability of steelhead to access networks of smaller tributaries at higher elevations is far more important than having a steady flow in a single low elevation, mainstem channel that is urbanized and channelized with simplified habitat.

What percentage of the late-rearing juvenile habitats are above the proposed dam?

Steelhead are extremely sensitive to water temperature, both too hot and too cold. "Influences of Forest and Rangeland Management on Salmonid Fishes and Their Habitats", William R. Meehan, Editor, U.S. DoA 1991

Starting with 11,500 steelhead "Fish mortality was high (99% of the first group, and 93% of the second batch died) as long as summer water temperatures remained above 70 degrees Fahrenheit." The Monterey Peninsula Water Management District Sleepy Hollow Workshop Nov 25 1997
MPWMD Board Packet April 19 1999.

Steelhead are easily killed by *Ichthyophthirius* and *Flexibacter columnaris*, especially when water temperatures exceed 70 degrees.

"Infectious salmon anemia (ISA) is an incurable disease caused by a virus that seems to mutate easily. Crowded fish-farm conditions facilitate the spread of the disease. ISA has been found in Atlantic salmon raised in both Atlantic and Pacific Coast fish-farms. ISA has caused millions of dollars of losses in Norway, Scotland and New Brunswick, Canada, where entire fish stocks had to be destroyed to prevent further spread of the infection." EIJ Spring 2000

Steelhead can be killed by stress from handling for a rearing facility or handling for a trap and truck operation.

Please quantify these potential deaths.

Steelhead in rearing facilities can be eaten by birds. In 1999 some 8,000 steelhead were eaten by Merganser Ducks in the Carmel River Monterey Peninsula Water Management District rearing facility.

Please quantify these potential deaths and their rate.

Electrofishing to rescue steelhead can kill the California Red-Legged Frogs and tadpoles (*Rana aurora draytonii*).

Please quantify potential deaths from Electrofishing and their rate.

Known endocrine disruptors include nonylphenols. OSF, p 217
Nonylphenol Ethoxylates deteriorate rainbow trout gills, yet are

classified as an "inert" ingredient in Quick Wipes and Bug Guard
Anti-Insect Paint. -Western Environmental Law Update, Spring 2000

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on West Coast Steelhead (*Oncorhynchus mykiss*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

*** 624 - WEST COAST STEELHEAD (ONCORHYNCHUS MYKISS) HABITAT.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on West Coast Steelhead (Oncorhynchus mykiss) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on West Coast Steelhead (Oncorhynchus mykiss) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 625 - TIDEWATER GOBY (EUCYCLOGOBIUS NEWBERRYI).**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Tidewater Goby (eucyclogobius newberryi).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This is a Federally listed Endangered species. Monterey County lies within the center of the natural range of the Tidewater Goby. Monterey County is well within the range of this species. It was collected from the Salinas River lagoon in 1946 and 1951. The Goby can live 8 km upstream of lagoon or estuary according to Irwin and Soltz (1984).

It could inhabit any of the watersheds this project drain into.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance on Tidewater Goby (*eucyclogobius newberryi*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 626 - TIDEWATER GOBY (EUCYCLOGOBIUS NEWBERRYI) HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on

Tidewater Goby (eucyclogobius newberryi) Habitat.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Tidewater Goby (eucyclogobius newberryi) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 627 - VERNAL POOL FAIRY SHRIMP (BRANCHINECTA LYNCHI).

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the project's potential impacts on
Vernal Pool Fairy Shrimp (Branchinecta lynchi).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a Federally listed Threatened species.
Its range includes the vernal pools of Monterey County.
Ft. Ord has several vernal pools containing Vernal Pool Fairy Shrimp.

Vernal Pool Fairy Shrimp might live in the vernal pools in the proposed driving range area.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Vernal Pool Fairy Shrimp (Branchinecta lynchi).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the

equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 628 - VERNAL POOL FAIRY SHRIMP (BRANCHINECTA LYNCHI) HABITAT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the project's potential impacts on Vernal Pool Fairy Shrimp (Branchinecta lynchi) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Vernal Pool Fairy Shrimp (Branchinecta lynchi) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 629 - AMPHIBIANS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Amphibians.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The world's frogs, toads and other amphibians are vanishing, and the decline began decades before scientists first sounded the alarm in the 1980s, according to the biggest statistical study of the topic.

The findings, published in Apr 13 2000 issue of the journal Nature, were compiled by a University of Ottawa researcher, using Internet contacts with some 200 scientists around the world.

Data on 936 populations of amphibians and 157 species came in from 37 countries and eight regions of the world.

Trends varied by time and place. In Western Europe, a sharp decline in the early 1960s leveled off later. In North America, the decline was slower, but steady.

The loss of amphibians causes a large increase in flies and mosquitos.

Since amphibians can easily absorb dangerous chemicals including pesticides, nitrites and nitrates through their permeable skin, they represent sensitive indicators of environmental stress.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Amphibians.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 630 - CALIFORNIA RED-LEGGED FROG (RANA AURORA DRAYTONII).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on

California Red-Legged Frog (*Rana aurora draytonii*).

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

This is a Federally listed Threatened species as of May 23 1996 (61 FR 25813). Monterey County is well within the range of this species.

Mark Twain became famous when he wrote an account of a jumping frog contest in Calaveras County. Those Celebrated Frogs of Mark Twain's article, the red-legged frogs, as the only large native frogs in California, were undoubtedly the contestants in that event.

This native California frog ("CRLF") is now gone from the Sierras including Calaveras County, but it still hangs on in a very few places. One of those few places is the Rancho San Carlos project site. When the Frogs were listed as an endangered species the federal government made it clear that this project site is one of only three places left in the world where significant populations of Mark Twain's frogs still live.

DRY-LAND TRAVELERS
California Red-Legged frogs (CRLF) have been documented as moving as much as two miles (3.2 km) from aquatic sites "without regard for topography." Federal Register Sept, 11, 2000, pg 54894

(The following is quoted from the US Fish & Wildlife Service - "Guidance on Site assessment and Field surveys for California red-legged frogs, Appendix - California red-legged frog ecology and distribution." Dated February 18, 1997.

"Movement California red-legged frog may move up to 1.6 km (ONE MILE) UP OR DOWN A DRAINAGE and are known to wander throughout riparian woodlands up to several dozen meters from the water. On rainy nights California red-legged frog may ROAM AWAY FROM AQUATIC SITES AS MUCH AS 1.6 KM (ONE MILE). California red-legged frog will often move away from the water after the first winter rains, causing sites where California red-legged frog were easily observed in the summer months to appear devoid of this species."

According to the USFWS Biological Opinion on nearby Rancho San Carlos (dated September 6, 1996) the - "California red-legged frog could inhabit any aquatic and riparian areas within the range of the species and also any landscape features near riparian areas that provide cover and moisture."

"Any aquatic and riparian areas within the range of the species"

The Federal Register ESA Listing of the Frog expands on and gives additional examples of Frog habitat. "California red-legged frogs have been found up to 30 m (98 feet) from water in adjacent dense riparian vegetation for up to 77 days."

"Estivation habitat is essential for the survival of California red-legged frogs within a watershed."

"Estivation habitat for the California red-legged frog is potentially all aquatic and riparian areas within the range of the species and includes any landscape features that provide cover and moisture during the dry season within 300 feet of a riparian area. This could include boulders or rocks and organic debris such as downed trees or logs; industrial debris; and agricultural features, such as drains, watering troughs, spring boxes, abandoned sheds, or hay-ricks. Incised stream channels with portions narrower than 18 inches and depths greater than 18 inches may also provide estivation habitat." (From the Federal Register for Thursday, May 23, 1996)

THESE FROGS CAN LIVE WITHOUT PONDS OR WETLANDS
A US-FWS letter to Monterey County in Mar 1998 on the "September Ranch" FEIR states "Concluding the CRLF does not occur on the project site because the site does not have ponds or other wetland habitat with riparian vegetation is erroneous because this species exhibits complex temporal variations in behavior and habitat use."

CALIFORNIA RED-LEGGED FROG HABITAT MAP NEEDED
Since the California Red-Legged Frog can range up to a mile in any direction from aquatic sites that makes a circle two miles in diameter as potential habitat for the frog from each known aquatic location within its range.

Please prepare a Meaningful Map of all Potential Habitat
Since California Red-Legged frog can "roam away from aquatic sites as much as 1.6 km", a complete map of potential California Red-Legged frog habitat for the project site is needed to determine which areas potentially contain California Red-legged frog habitat.

Bullfrogs are predators of the California Red-Legged Frog. As weak swimmers bullfrogs are susceptible to being washed out of a river into the ocean as opposed to the California Red-Legged Frog which can avoid high natural, temporary flows by leaving the stream. Other CRLF predators include crayfish and centrarchid fishes as well as herons, egrets, opossums and raccoons. "Trash left during or after project activities could attract predators such as raccoons to work sites which in turn could harass or prey on the listed species." US-FWS Biological Opinion on Arroyo Seco Bridge Replacement. April 27 1999

Diet

"Invertebrates are the most common food item for adults. Larvae probably eat algae. Vertebrates, such as the Pacific Tree frogs and California mice (*Peromyscus californicus*), represented over half the prey mass eaten by larger frogs."

Hazards

"Accidental spills of hazardous materials or careless fueling or oiling of vehicles or equipment could degrade water quality or upland habitat to a degree where CRLF are adversely affected or killed." The contamination of the stream by wet concrete could cause potential skin and respiratory system irritation in CRLFs. Work in live streams or in floodplains could cause unusually high levels of siltation downstream. This siltation could alter the quality of habitat downstream and preclude its use by CRLF." US-FWS Biological Opinion on Arroyo Seco Bridge Replacement. April 27 1999

Nitrite and Nitrate hazards

Oregon State University researchers "have named the nitrogen based compounds found in fertilizers as likely suspects in the rapid decline of at least one frog species in the Pacific Northwest."

The maximum recommended nitrite limit for drinking water, 1 milligram per liter, was sufficient to kill well over half of the Oregon spotted frog tadpoles and about half of the northwestern salamander tadpoles.

Nitrate compounds can be readily converted to nitrites through a number of environmental processes including bacteria.

Please Consult with Fish and Wildlife Service and the California Dept of Fish and Game.

LOCATIONS

CRLF are abundant in the Carmel River watershed according to studies done for The Monterey Peninsula Water Management District.

Numerous breeding CRLF have been found in Pebble Beach in Seal Rock Creek, in the drainage east of Cypress Point Golf Course, and adjacent to and on water hazards of Spyglass Golf course (2002-2003). PBC DEIR 2004

One CRLF was observed in Hatton Canyon, A tributary of the Carmel River, by a CalTrans Biologist in 1996.

"[They] have been observed at an impoundment near the end of Pesante Road, approximately 1.25 miles north of the site and in a marsh west of Prunedale." -Rancho San Juan project ADC Specific Plan Draft Program EIR pg 5-52 The Prunedale Bypass EIS/EIR indicated that this species was present along the Alternative 4 alignment.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Red-Legged Frog (*Rana aurora draytonii*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it

vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 631 - CALIFORNIA RED-LEGGED FROG (RANA AURORA DRAYTONII) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on California Red-Legged Frog (*Rana aurora draytonii*) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on California Red-Legged Frog (*Rana aurora draytonii*) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
- * 632 - SOUTHWESTERN POND TURTLE (CLEMMYS MARMAROTA).
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Southwestern Pond Turtle (Clemmys marmorata).
- If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.
- This turtle originally inhabited most Pacific drainages in California from the Oregon to Mexico borders. The species has been separated into two subspecies (C.m. marmorata is the northwestern subspecies and C.m. pallida is the southwestern subspecies), both of which are listed as Category 2 Candidate by US-FWS and as a CDFG Species of Special Concern.
- This species was observed at three ponds on Rancho San Carlos on several occasions in 1991. Rancho San Carlos FEIR pg 11-25 1995
- Their predators could include introduced fish, wild boar and bullfrogs.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
- Southwestern Pond Turtle (Clemmys marmorata).
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

*** 633 - SOUTHWESTERN POND TURTLE (CLEMMYS MARMAROTA) HABITAT.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Southwestern Pond Turtle (Clemmys marmorata) Habitat.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Southwestern Pond Turtle (Clemmys marmorata) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 634 - SANTA CRUZ LONG-TOED SALAMANDER.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Santa Cruz Long-Toed Salamander.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

This is a State and federally listed Endangered species. (Ambystoma macrodactylum croceum) Monterey County is within the southern end of its range. It is found on the northeastern edge of Moro Cojo Slough, in Coastal woodland and chaparral near ponds and freshwater marshes. They frequent coastal woodlands and chaparral near ponds and freshwater marshes (CDF&G 1980).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Santa Cruz Long-Toed Salamander.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 635 - SANTA CRUZ LONG-TOED SALAMANDER HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Santa Cruz Long-Toed Salamander Habitat.

If you claim the document contains proof of no-significant-impact for

this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Santa Cruz Long-Toed Salamander Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 636 - CALIFORNIA VEGETATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of California Vegetation.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"California is extraordinarily rich in native plant species with 5,057 representative vascular plants. Of these, 1,525 or 30% are endemic to California."

"The diversity of plant life in California is also very high. Of the major plant types identified in the contiguous 48 states in 1964, California holds one-fourth of all those types."

"The plant species in California are under constant threat from urbanization, agriculture, forest destruction, and water pollution."
"It has been calculated that more than 25 species are already extinct in the wild, more than 150 species are endangered, and some 280 species threatened. Calculations indicate that one-fourth of all threatened and endangered plant of the U.S. are located in California."
- California an Environmental Atlas and Guide, Bern Kreissman, 1991

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of California Vegetation.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 637 - VEGETATION REMOVAL INCREASING FLOODING.**

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Vegetation Removal Increasing Flooding.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Vegetation slows runoff flow, allowing more water to infiltrate the soil
reducing flooding.
Overgrazing, deforestation and surface mining "are notorious for removing
vegetative cover and contributing to the hazard of floods."
Environmental Science; Morgan, Moran & Weirsma; W.C. Brown Pub. 1993,468

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Vegetation Removal Increasing Flooding.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 638 - MONTEREY CLOVER (TRIFOLIUM TRICHOCLALYX).**

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the project's potential impacts on
Monterey Clover (Trifolium trichocalyx).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a Federally (as of September 11 1998) and California listed
Endangered species. Its habitat includes native Monterey pine forest,
especially on the Monterey Peninsula.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Monterey Clover (Trifolium trichocalyx).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 639 - MONTEREY CLOVER (TRIFOLIUM TRICHOCALYX) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Monterey Clover (Trifolium trichocalyx) Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Monterey Clover (Trifolium trichocalyx) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 640 - PACIFIC GROVE CLOVER (TRIFOLIUM POLYODON).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Pacific Grove Clover (Trifolium polyodon).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This is a Federal Species of concern. It is California listed as Rare. Its habitat includes native Monterey Pine forest, especially on the Monterey Peninsula.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Pacific Grove Clover (Trifolium polyodon).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 641 - PACIFIC GROVE CLOVER (TRIFOLIUM POLYODON) HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impact on Pacific Grove Clover (Trifolium polyodon) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Pacific Grove Clover (Trifolium polyodon) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 642 - HICKMAN'S POTENTILLA OR CINQUEFOIL (POTENTILLA HICKMANII).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Hickman's Potentilla or Cinquefoil (Potentilla Hickmanii).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a Federally (as of September 11, 1998) and California listed
Endangered species . Monterey County is well within the range of this
species. Its habitat includes native Monterey pine forest. One observed
location in Monterey Co is Indian Village in Pebble Beach.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Hickman's Potentilla or Cinquefoil (Potentilla Hickmanii).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 643 - HICKMAN'S POTENTILLA OR CINQUEFOIL (POTENTILLA HICKMANII) HABITAT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the project's potential impacts on Hickman's Potentilla or Cinquefoil (Potentilla Hickmanii) Habitat.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Hickman's Potentilla or Cinquefoil (Potentilla Hickmanii) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 644 - YADON'S (REIN ORCHID) PIPERIA (PIPERIA YADONII).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Yadon's (Rein Orchid) Piperia (Piperia yadonii).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This lovely and beautifully fragile Orchid is a Federally listed Endangered species as of September 11 1998. Monterey County is well within the range of this species.

Its habitat is almost entirely native Monterey pine forest. its largest populations are in Del Monte Forests' Jeffers' Forest and just East of the Cypress Point Golf Course.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Yadon's (Rein Orchid) Piperia (Piperia yadonii).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a

specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

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* 645 - YADON'S (REIN ORCHID) PIPERIA (PIPERIA YADONII) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Yadon's (Rein Orchid) Piperia (Piperia yadonii) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Yadon's (Rein Orchid) Piperia (Piperia yadonii) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 646 - COASTAL DUNES MILK VETCH (ASTRAGALUS TENER VAR TITI).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Coastal Dunes Milk Vetch (Astragalus tener var Titi).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

It is California listed as Endangered and Federally listed as Endangered
as of September 11 1998. Its range includes Monterey County.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Coastal Dunes Milk Vetch (Astragalus tener var Titi).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 647 - COASTAL DUNES MILK VETCH (ASTRAGALUS TENER VAR TITI) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Coastal Dunes Milk Vetch (Astragalus tener var Titi) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Coastal Dunes Milk Vetch (Astragalus tener var Titi) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 648 - SEASIDE BIRD'S BEAK (CORDYLANTHUS RIGIDUS VAR. LITTORALIS).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Seaside Bird's Beak (Cordylanthus rigidus var. littoralis).

If you claim the document contains proof of no-significant-impact for

this impact please explicitly state the page number and paragraph.

This is a Federally and California listed Endangered species. It grows in the coast ranges of Monterey and Santa Barbara Counties, in closed cone conifer forest, coastal shrub, oak woodland and chapparral on dry sandy soils below 3000 feet ASL.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Seaside Bird's Beak (*Cordylanthus rigidus* var. *littoralis*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 649 - SEASIDE BIRD'S BEAK (CORDYLANTHUS RIGIDUS VAR LITTORALIS). HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Seaside Bird's Beak (Cordylanthus rigidus var. littoralis) Habitat.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Seaside Bird's Beak (Cordylanthus rigidus var littoralis). Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 650 - TIDESTROM'S LUPINE (LUPINUS TIDESTROMII VAR. TIDESTROMII).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Tidestrom's Lupine (Lupinus tidestromii var. tidestromii).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a Federally and California listed Endangered species.
It grows
in coastal dunes on the Monterey Peninsula.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance on
Tidestrom's Lupine (Lupinus tidestromii var. tidestromii).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 651 - TIDESTROM'S LUPINE (LUPINUS TIDESTROMII VAR TIDESTROMII). HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Tidestrom's Lupine (Lupinus tidestromii var. tidestromii) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Tidestrom's Lupine (Lupinus tidestromii var tidestromii). Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
- 30 Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
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- * 652 - SANTA CRUZ WALLFLOWER (ERYSIMUM TERETIFOLIUM).
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Santa Cruz Wallflower (Erysimum teretifolium).
- If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
- This is a Federally listed Endangered species. It grows on Montane conifer forest on inland marine sands.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Santa Cruz Wallflower (Erysimum teretifolium).
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the

equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

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* 653 - SANTA CRUZ WALLFLOWER (ERYSIMUM TERETIFOLIUM) HABITAT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the project's potential impacts on Santa Cruz Wallflower (Erysimum teretifolium) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Santa Cruz Wallflower (*Erysimum teretifolium*) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 654 - SANTA CRUZ TARPLANT (*HOLOCARPA MACRADENIA*).

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the project's potential impacts on Santa Cruz Tarplant (*Holocarpa macradenia*).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This plant is California listed as Endangered and is a Federally listed candidate species. Sometimes called Santa Cruz Tarweed, it grows along the coast in Monterey, Contra Costa and Santa Cruz Counties.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Santa Cruz Tarplant (*Holocarpa macradenia*).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be

impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 655 - SANTA CRUZ TARPLANT (HOLOCARPA MACRADENIA) HABITAT.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the project's potential impacts on Santa Cruz Tarplant (Holocarpa macradenia) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Santa Cruz Tarplant (Holocarpa macradenia) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 656 - MENZIE'S WALLFLOWER.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Menzie's Wallflower.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a Federally and California listed Endangered species as of 1995 (NDDBS). (Erysimum menziesii) It grows in coastal dunes at Pt. Lobos in Monterey County, at Asilomar State park and from Fort Bragg to North of Humboldt bay.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Menzie's Wallflower.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 657 - MENZIE'S WALLFLOWER HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Menzie's Wallflower Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Menzie's Wallflower Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 658 - COASTAL DUNES RATTLEWEED.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Coastal Dunes Rattleweed.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This is a Federally listed Endangered species. It grows in coastal dunes and scrub along Monterey Bay and San Diego Bay.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Coastal Dunes Rattleweed.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 659 - COASTAL DUNES RATTLEWEED HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Coastal Dunes Rattleweed Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Coastal Dunes Rattleweed Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 660 - MONTEREY BAY (OR SAND) GILIA (ASTRALAGUS TENER VAR. TITI).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Monterey Bay (or Sand) Gilia (Astragalus tener var. titi).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Sand Gilia is Federally listed as Endangered as of June 22 1992 (57 FR 27858) and California listed as Threatened species. It grows in coastal dunes, scrub and maritime chaparral from Moss Landing to the Monterey Peninsula. Fort Ord may support 50 to 70 percent of its range on some 3757 acres. A small population was found west of Highway One.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Monterey Bay (or Sand) Gilia (Astragalus tener var. titi).

1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit

the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

-
* 661 - MONTEREY BAY (OR SAND) GLIA (ASTRALAGUS TENER VAR TITI). HABITAT.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the project's potential impacts on
Monterey Bay (or Sand) Gilia (Astragalus tener var. titi) Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Monterey Bay (or Sand) Gilia (Astragalus tener var titi). Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 662 - CONTRA COSTA GOLDFIELDS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the project's potential impacts on
Contra Costa Goldfields.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

This is a Federally listed Endangered species as of June 18 1997 (62 FR 33029). It was found at Fort Ord on June 1998. FWS Biological Opinion March 99 It occurs in shallow vernal pools and vernal pool margins in open grassy areas of woodland and valley grassland communities.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Contra Costa Goldfields.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 663 - CONTRA COSTA GOLDFIELDS HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Contra Costa Goldfields Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance on Contra Costa Goldfields Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
- * 664 - MONTEREY SPINEFLOWER (CHORIZANTHE PUNGENS VAR PUNGENS).
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Monterey Spineflower (Chorizanthe Pungens var Pungens).
- If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
- This is a Federally listed Threatened species as of Feb 4 1994 (59 FR 5499). Fort Ord may support 75 to 90 percent of its range on some 10,402 acres. Residential development and recreational use have reduced its population.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Monterey Spineflower (Chorizanthe Pungens var Pungens).
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
- 30 Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.
- ENDANGERED SPECIES
This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.
- SPECIES RANGE
1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.
- LOCAL OBSERVATIONS
2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 665 - MONTEREY SPINEFLOWER (CHORIZANTHE PUNGENS VAR PUNGENS) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Monterey Spineflower (Chorizanthe Pungens var Pungens) Habitat.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Monterey Spineflower (Chorizanthe Pungens var Pungens) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 666 - YADON'S WALLFLOWER (ERYSIMUM MENZIESII SSP YADONII).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on

Yadon's Wallflower (Erysimum Menziesii ssp Yadonii).

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

This is a Federally and California listed Endangered species as of 1995 (NDDBS). Monterey County is well within the range of this species.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Yadon's Wallflower (Erysimum Menziesii ssp Yadonii).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 667 - YADON'S WALLFLOWER (ERYSIMUM MENZIESII SSP YADONII) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Yadon's Wallflower (Erysimum Menziesii ssp Yadonii) Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Yadon's Wallflower (Erysimum Menziesii ssp Yadonii) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 668 - BEACH LAYIA (LAYIA CARNOSA).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impact on Beach Layia (Layia Carnosa).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

This species is federally and California listed as Endangered.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Beach Layia (Layia Carnosa).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 669 - BEACH LAYIA (LAYIA CARNOSA) HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Beach Layia (Layia Carnosa) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Beach Layia (Layia Carnosa) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 670 - ROBUST SPINEFLOWER.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Robust Spineflower.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

(Chorizanthe Robusta var robusta) This species is federally listed as
Endangered.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Robust Spineflower.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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9. Please state the variance's MARGINS of ERROR or confidence level.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 671 - ROBUST SPINEFLOWER HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Robust Spineflower Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Robust Spineflower Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 672 - HICKMAN'S ONION (ALLIUM HICKMANII).

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Hickman's Onion (Allium hickmanii).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Monterey County is well within the range of this species.
Global Rank: G2
Calif Native Plants Society List: 1B, CNPS Code: 2-2-3
Listing Status - Federal: Category 1 ("Species of Concern")
Its habitat includes native Monterey pine forest.
"...more than 200 Hickman's Onions [were] present [on the Macomber Estates site in Pebble Beach's Jeffer's Forest in Pescadero Canyon]."
Macomber Estates Final EIR. 1992 p 71

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Hickman's Onion (Allium hickmanii).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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laws.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.
3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.
8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.
9. What margin of error do these numbers have?
10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or

specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species
18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

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* 673 - HICKMAN'S ONION (ALLIUM HICKMANII) HABITAT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the project's potential impacts on Hickman's Onion (Allium hickmanii) Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Hickman's Onion (Allium hickmanii) Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
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29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
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46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 674 - HOOKER'S MANZANITA.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Hooker's Manzanita.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- Monterey County is well within the range of this species.
Calif Native Plants Society List: 1B
Listing Status - Federal: Category 2
Calif Native Plants Society List: 1A
Its habitat includes native Monterey pine forest.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Hooker's Manzanita.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
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- 20b. If no margin of error is used please state that clearly.
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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 675 - HOOKER'S MANZANITA HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Hooker's Manzanita Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Hooker's Manzanita Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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-

* 676 - COAST BUCKWHEAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Coast Buckwheat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Smith's Blue Butterfly (*Euphilotes enoptes smithi*) is a Federally listed
Endangered species since June 1 1976 (41 FR 22044).
Monterey County lies
within the center of the natural range of this species.
Monterey County
is well within the range of this species. It has been found at the mouth
of the Salinas River.

This butterfly is a subspecies found in some 25 localities within the
coastal fog belt of Monterey and Santa Cruz Counties. It is found
almost exclusively on two species of wild buckwheat:
Eriogonum
latifolium, which occurs on coastal sand dunes and bluffs,
and *E.*
parvifolium, which occurs on dunes, bluffs, and chaparral-covered
hillsides away from the immediate coast. -Salinas Valley
Saltwater
Intrusion Project DEIR/S Technical Appendices Dec 1990

The butterflies lay their eggs exclusively in the buckwheat species
mentioned above. It is also a food source for the butterfly.
It rarely travels more than 100 yards from its home plant.

"Coast buckwheat (*Eriogonum parvifolium*) was sighted growing on a road
cut on the southwest end of the project site (Macomber Subdivision in
Jeffers Forest in Pescadero Canyon) near Seventeen-Mile Drive."
Macomber Estates Final EIR. 1992 p 71

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Coast Buckwheat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it

vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 677 - BIOMASS WEIGHT (OR MASS) LOSS.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the project's potential impacts on Biomass Weight (or Mass) Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Biomass "The weight or volume of all living things in a given geographical area. It is a measure of the abundance of life, both plant and animal, that a particular area can support." -Dictionary of Scientific Literacy, 1992

Biomass is "the total mass of all individuals of a species in a given area." from the 1978 textbook "Biological Science, An Ecological Approach."

Please estimate the mass (weight) and volume of the loss of the biomass as a separate impacts.

Please use pounds and kilograms to measure this impact. Alternatively you can use kilograms per hectare or pounds per acre.

Wood can vary in density from 160 (balsa) to 1040 kilograms per cubic meter. Most woods range between 320 to 720 kg/m³ and can vary within a wood species by some 10 percent. Radiata (Monterey) pine has a density of 520 kg/cubic meter. USDA Forest Products Lab, 1996 (28.5 pounds / cubic foot - Dunning 1916)

According to the PG&E Forester for the Monterey Peninsula area, Stuart Craig, a mature Monterey pine typically weighs about 5 tons (ten thousand pounds). A natural Monterey Pine forest can have a tree density of 60 to 400 trees per acre.

Counting trees is not a substitute for measuring or estimating biomass as trees can vary in biomass by more than 2 magnitudes (seedling vs mature tree) in mass.

At 500 kilograms per cubic meter a single Sequoia redwood tree can exceed 750,000 kilograms (1.65 million pounds) in trunk mass alone; a coast redwood tree trunk can exceed 500,000 kilograms (1.1 million pounds); a Douglas fir can reach 175,000 kilograms; a sitka spruce 170,000 kilograms; a western red cedar 250,000 kilograms.

While a typical old growth forest biomass is some 400 tons per acre, an old growth redwood forest can easily have a biomass of 1800 tons per acre and a rainforest contains some 180 tons per acre.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Biomass Weight (or Mass) Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 678 - BIOMASS VOLUME LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Biomass Volume Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Please estimate the mass (weight) and volume of the loss of the biomass as a separate impacts.

Please use cubic feet and cubic meters to measure this impact.

Counting trees is not a substitute for measuring or estimating biomass as tree's biomass can vary by more than a magnitude in volume.

A single Sequoia redwood tree can exceed 1400 cubic meters in trunk volume alone; a coast redwood tree can exceed 1000 cubic meters (trunk volume); a Douglas fir can reach 350 cubic meters; a sitka spruce 330 cubic meters; a western red cedar 500 cubic meters.
"Redwood Forest"
Island Press 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Biomass Volume Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20s. Please state whether this MARGIN of ERROR is measured or assumed.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 679 - BIOMASS RESTORATION.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Biomass Restoration.

Developers and loggers typically want to evade dealing with biomass because when they only count the trees lost - they falsely claim they can reasonably mitigate one seedling for every tree cut. To use their own ratio we suggest that for every cubic meter of biomass removed that one cubic meter of living forest be replaced as mitigation; and one ratio we suggest that for every kilogram of biomass removed that one kilogram of living forest be replaced as mitigation.

* 680 - LOSS OF ENERGY CONSERVATION FROM TREES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Loss of Energy Conservation from Trees.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

California Code 4799.07. The Legislature finds and declares that:

(c) Trees play an important role in energy conservation by the modification of temperature extremes, humidity, and winds. This role is particularly important in reducing the amount of energy consumed in heating and cooling buildings and homes, and potentially in producing a local fuel and energy source.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Loss of Energy Conservation from Trees.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 681 - NATIVE TREE PLANTING TO INCREASE ENERGY CONSERVATION.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Native Tree Planting to Increase Energy conservation.

California Code 4799.07. The Legislature finds and declares that:

(c) Trees play an important role in energy conservation by the modification of temperature extremes, humidity, and winds. This role is particularly important in reducing the amount of energy consumed in heating and cooling buildings and homes, and potentially in producing a local fuel and energy source.

* 682 - LOSS OF COOLING SHADE FROM TREES.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the project's potential impacts on Loss of Cooling Shade from Trees.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Gaps left by single-tree loggers had less shade and higher peak temperatures (95 degrees vs. 79 degrees) than natural tree falls. Such a change might have a variety of consequences. For example, the researchers found that the higher temperatures attracted heat-loving lizards. These predators sunbathe and then lunch in the surrounding forest. More sunny spots - and more lunching lizards-might threaten both their prey and competitors." Vitt, Conservation Biology, June 1998 reported in Science News June 20, 1998

Trees provide significant areas of shade which prevent heating of soils and their drying. Dry soils do not support some native species of plants and microorganisms and can support invasive plants.

The amount of shade a tree provides can be measured in square feet at noon.

California Code 4799.07. The Legislature finds and declares that:

(c) Trees play an important role in energy conservation by the modification of temperature extremes, humidity, and winds. This role is particularly important in reducing the amount of energy consumed in heating and cooling buildings and homes, and potentially in producing a local fuel and energy source.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Loss of Cooling Shade from Trees.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 683 - NATIVE TREE PLANTING TO INCREASE COOLING SHADE.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Native Tree Planting to Increase Cooling Shade.

Trees cast shadows and emit water vapor which cools the air underneath and seeping out with the wind.

California Code 4799.07. The Legislature finds and declares that:

(c) Trees play an important role in energy conservation by the modification of temperature extremes, humidity, and winds. This role is particularly important in reducing the amount of energy consumed in heating and cooling buildings and homes, and potentially in producing a local fuel and energy source.

* 684 - TREE REMOVAL CAUSING HUMIDITY LOSS IN DRY CLIMATES.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Tree removal Causing Humidity Loss in Dry Climates.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Trees cast shadows and emit water vapor which cools the air and humidifies it.

Labware Direct (1 800 356 0783) sells humidity detection systems measuring concentrations as low as 0.1% with +/- 2% accuracy.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Tree removal Causing Humidity Loss in Dry Climates.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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* 685 - LOSS OF NIGHTTIME WARMING INSULATION FROM TREES.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Loss of Nighttime Warming Insulation from Trees.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

California Code 4799.07. The Legislature finds and declares that:

(c) Trees play an important role in energy conservation by the modification of temperature extremes, humidity, and winds. This role is particularly important in reducing the amount of energy consumed in heating and cooling buildings and homes, and potentially in producing a local fuel and energy source.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Loss of Nighttime Warming Insulation from Trees.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 686 - LOSS OF WIND PROTECTION FROM TREES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Loss of Wind Protection from Trees.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Trees and forests can dramatically reduce wind speed at ground level
compared with the same area devoid of trees.

"[The wind] can be screaming above an old growth forest and almost silent inside." says Dennis Thompson, professor of meteorology at Pennsylvania State U. quoted in Backpacker magazine, Aug 1999, p 29

California Code 4799.07. The Legislature finds and declares that:
(c) Trees play an important role in energy conservation by the modification of temperature extremes, humidity, and winds. This role is particularly important in reducing the amount of energy consumed in heating and cooling buildings and homes, and potentially in producing a local fuel and energy source.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Loss of Wind Protection from Trees.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 687 - NATIVE TREE PLANTING TO INCREASE WIND PROTECTION.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Native Tree Planting to Increase Wind Protection.

California Code 4799.07. The Legislature finds and declares that:

(c) Trees play an important role in energy conservation by the modification of temperature extremes, humidity, and winds. This role is particularly important in reducing the amount of energy consumed in heating and cooling buildings and homes, and potentially in producing a local fuel and energy source.

* 688 - SONGBIRD HABITAT LOSS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Songbird Habitat Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

California Code 4799.07. The Legislature finds and declares that:

(e) Trees also help reduce noise, provide habitat for songbirds and other wildlife, reduce surface runoff and protect urban water resources, and enhance the aesthetic quality of life in the city.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Songbird Habitat Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 689 - NATIVE TREE PLANTING TO INCREASE SONGBIRD HABITAT.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Native Tree Planting to Increase Songbird Habitat.

California Code 4799.07. The Legislature finds and declares that:

(e) Trees also help reduce noise, provide habitat for songbirds and other wildlife, reduce surface runoff and protect urban water resources, and enhance the aesthetic quality of life in the city.

* 690 - SURFACE RUNOFF PROTECTION LOSS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Surface Runoff Protection Loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

California Code 4799.07. The Legislature finds and declares that:

(e) Trees also help reduce noise, provide habitat for songbirds and other wildlife, reduce surface runoff and protect urban water resources, and enhance the aesthetic quality of life in the city.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Surface Runoff Protection Loss.

1b. If no objective criteria are used please state that clearly.

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3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 691 - NATIVE TREE PLANTING TO DECREASE RUNOFF.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Native Tree Planting to Decrease Runoff.

California Code 4799.07. The Legislature finds and declares that:

(e) Trees also help reduce noise, provide habitat for songbirds and other wildlife, reduce surface runoff and protect urban water resources, and enhance the aesthetic quality of life in the city.

-

* 692 - AESTHETIC ENHANCEMENT LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Aesthetic Enhancement Loss.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

California Code 4799.07. The Legislature finds and declares that:

(e) Trees also help reduce noise, provide habitat for songbirds and other wildlife, reduce surface runoff and protect urban water resources, and enhance the aesthetic quality of life in the city.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Aesthetic Enhancement Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 693 - NATIVE TREE PLANTING TO INCREASE AESTHETIC ENHANCEMENT.**

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Native Tree Planting to Increase Aesthetic Enhancement.

California Code 4799.07. The Legislature finds and declares that:

(e) Trees also help reduce noise, provide habitat for songbirds and other wildlife, reduce surface runoff and protect urban water resources, and enhance the aesthetic quality of life in the city.

*** 694 - MORE TREES LOST THAN REPLACED.**

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on More Trees Lost than Replaced.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Growing conditions in urban areas for trees and associated plants have worsened so that many California cities are now losing more trees than are replaced. Even when 5 trees are planted for every one that is cut down, the total number of trees declines.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on More Trees Lost than Replaced.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 695 - LOSS OF PSYCHOLOGICAL LINK WITH NATURE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Loss of Psychological link with Nature.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

California Code 4799.07. The Legislature finds and declares that:
(a) Trees serve as a vital resource in the urban environment and as an important psychological link with nature for the urban dweller.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Loss of Psychological link with Nature.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 696 - NATIVE TREE PLANTING TO IMPROVE PSYCHOLOGICAL LINK WITH NATURE.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Native Tree Planting to Improve Psychological link with Nature.

California Code 4799.07. The Legislature finds and declares that:
(a) Trees serve as a vital resource in the urban environment and as an important psychological link with nature for the urban dweller.

-

* 697 - LOSS OF OLD TREES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Loss of Old Trees.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Not infrequently, environmental consultants fail to recognize the ecological value of old trees, dead trees, snags, and fallen trees.

Dead standing trees, called snags, provide habitat for many animals that do not live in fallen trees.

"Dead trees are so important to the functioning of forest ecosystems that Maine wildlife biologist Mac Hunter devoted an entire chapter to the subject in his recent book "Wildlife, Forests, and Forestry: Principles of Managing Forests for Biological Diversity. Snags create important habitat for many species of birds, insects and mammals. Cavity nesting species such as woodpeckers and nuthatches help control insects (e.g. bark beetles) that could cause significant tree mortality if unchecked. Owls and aAmerican Kestrels, which often live in cavities created by woodpeckers, help control prolific small mammals that could wipe out conifer seeds and severely reduce regeneration." Beyond the Beauty Strip, Mitch Lansky 1992, Tilbury House

The following is taken verbatim from an EIR by EMC Planning Group of Monterey, CA describing a rare native forest of Monterey pines in Pebble Beach, California -

"A large stand of mature to OVER-mature Monterey pine (Pinus radiata) trees dominate the site." "There are several large, dead, standing trees as well as fallen trees, decaying stubs, and snags present on the project site. They are not the result of disease or insect damage but the effects of old age. '... many Monterey Pine seedlings, saplings and poles suffer from overcrowding or the effects of competing understory vegetation during the establishment phase. Notwithstanding this overall characterization, many individual trees are healthy and vigorous."

How extraordinarily wonderful. Trees dying from old age. This is a description of a healthy living, natural forest. Not many people alive today have ever seen one.

According to the United Nations Food and Agricultural Organization the entire continent of Europe doesn't have a single native, natural forest left, yet this writer's words and tone clearly intends for the reader to consider this healthy natural forest as something like a run down car or house.

This is the viewpoint of a forester, not an ecologist. A forester wants a vigorous, young tree farm where trees don't have to compete with any other vegetation. Foresters don't like old trees because the wood might have decay and they darned sure like snags because you cant turn them into lumber.

It is important to note that "over-mature" cannot be found in an ecology or biology textbook because it is solely a forester's term.

Please tell us the number and percentage of mature and "over-mature" trees.

Please define over-mature in context with a healthy forest.

Please define overcrowding.

Please explain clearly what harm happens in an overcrowded ecosystem.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Loss of Old Trees.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 698 - LOSS OF SNAGS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Loss of Snags.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Not infrequently, environmental consultants fail to recognize the ecological value of old trees, dead trees, snags, and fallen trees.

Snags provide habitat for many animals that do not live in old trees, or fallen trees.

"Dead trees are so important to the functioning of forest ecosystems that Maine wildlife biologist Mac Hunter devoted an entire chapter to the subject in his recent book "Wildlife, Forests, and Forestry: Principles of Managing Forests for Biological Diversity. Snags create important habitat for many species of birds, insects and mammals. Cavity nesting species such as woodpeckers and nuthatches help control insects (e.g. bark beetles) that could cause significant tree mortality if unchecked. Owls and aAmerican Kestrels, which often live in cavities created by woodpeckers, help control prolific small mammals that could wipe out conifer seeds and severely reduce regeneration." Beyond the Beauty Strip, Mitch Lansky 1992, Tilbury House

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Loss of Snags.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 699 - LEAVE SNAGS STANDING.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Leave Snags Standing.

Dead standing trees, called snags, provide habitat for many animals that do not live in fallen trees.

"Dead trees are so important to the functioning of forest ecosystems that Maine wildlife biologist Mac Hunter devoted an entire chapter to the subject in his recent book "Wildlife, Forests, and Forestry: Principles of Managing Forests for Biological Diversity. Snags create important habitat for many species of birds, insects and mammals. Cavity nesting species such as woodpeckers and nuthatches help control insects (e.g. bark beetles) that could cause significant tree mortality if unchecked. Owls and aAmerican Kestrels, which often live in cavities created by woodpeckers, help control prolific small mammals that could wipe out conifer seeds and severely reduce regeneration." Beyond the Beauty Strip, Mitch Lansky 1992, Tilbury House

* 700 - LOSS OF FALLEN TREES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Loss of Fallen Trees.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Not infrequently, environmental consultants fail to recognize the ecological value of old trees, dead trees, snags, and fallen trees.

Fallen trees provide habitat for many animals that do not live in old trees, or Snags.

After a tree falls it becomes home to other insects, bacteria, and animals. It decomposes to become food for the rest of the forest.

"Dead trees are so important to the functioning of forest ecosystems that Maine wildlife biologist Mac Hunter devoted an entire chapter to the subject in his recent book "Wildlife, Forests, and Forestry: Principles of Managing Forests for Biological Diversity. Snags create important habitat for many species of birds, insects and mammals. Cavity nesting species such as woodpeckers and nuthatches help control insects (e.g. bark beetles) that could cause significant tree mortality if unchecked. Owls and aAmerican Kestrels, which often live in cavities created by woodpeckers, help control prolific small mammals that could wipe out conifer seeds and severely reduce regeneration." Beyond the Beauty Strip, Mitch Lansky 1992, Tilbury House

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Loss of Fallen Trees.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 701 - OVERCROWDED SEEDLINGS.

This is an impact normally caused by misinformed mitigation.

Typical Mitigation for forest logging includes planting seedlings.

What is the density (seedlings per hectare or per acre) that seedlings

will be planted?

What percentage of the seedlings will survive to become a mature tree?

What is the density (seedlings per hectare or per acre) of the seedling species when they become mature and then old?

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Overcrowded Seedlings.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Overcrowded Seedlings.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Overcrowded Seedlings.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Overcrowded Seedlings.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY
Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Overcrowded Seedlings.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Overcrowded Seedlings.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 702 - ONE TO ONE SEEDLING PLANTING MITIGATION.

A typical mitigation for forest removal includes planting seedlings on a one-to-one basis for each tree killed and removed. This is more than 99 percent non-mitigation.

First, it almost wholly ignores the loss of biomass in volume and mass.
Second, it assumes that planting seedlings somewhere they don't now live will be self-sustainable.
Third, if the seedlings will be planted where they do live now, it assumes that the density of trees and seedlings is less than normal.

Typically -

- 1) there is no map of the seedling planting location.
- 2) there is no analysis of impacts of planting seedlings at the proposed location.
- 3) there is no evidence that the proposed location can sustainably support any new trees.
- 4) There is no answer to the question - "If the tree seedlings can sustainably live in the new location, why aren't they living there now?"

So -

- 1) Please provide a map of the seedling planting location.
- 2) Please provide an impact analysis of impacts of planting seedlings at the proposed location.

3) please provide substantial evidence that the proposed location can sustainably support new trees - and how many at what density per acre.

4) Please answer the question - "If the tree seedlings can sustainably live in the new location, why aren't they living there now?"

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
One to One Seedling Planting Mitigation.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
One to One Seedling Planting Mitigation.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
One to One Seedling Planting Mitigation.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: One to One Seedling Planting Mitigation.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
One to One Seedling Planting Mitigation.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
One to One Seedling Planting Mitigation.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be

fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 703 - GAP PHASING.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of Gap Phasing.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

There is no evidence that gap phasing mimics any healthy natural forest process. Loggers have claimed that it increases the number of trees in the man-made gaps. The fallacies include that to do so you have to damage a living ecosystem; that you are artificially forcing a higher number of seedlings (not trees) most of which cannot reach maturity - of the trees which already are living.

"Gaps left by single-tree loggers had less shade and higher peak temperatures (95 degrees vs. 79 degrees) than natural tree falls. Such a change might have a variety of consequences. For example, the researchers found that the higher temperatures attracted heat-loving lizards. These predators sunbathe and then lunch in the surrounding forest. More sunny spots - and more lunching lizards-might threaten both their prey and competitors." Vitt, Conservation Biology, June 1998 reported in Science News June 20, 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Gap Phasing.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 704 - FOREST ECOSYSTEM SERVICES LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Forest Ecosystem Services Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"A tree that lives 50 years will contribute services worth \$196,250 within its life span." California Dept of Forestry and Fire Protection quoted in Forest Voice, 1998 Citizens Guide, Native Forest Council.

Temperate/boreal forests provide approx \$300 in Ecosystem services per hectare per year. "The value of the worlds ecosystem services and natural capital" by Costanza et al, Nature 15 may 1997 pg 256

Tropical forests provide approx \$2000 in Ecosystem services per hectare per year. "The value of the worlds ecosystem services and natural capital" by Costanza et al, Nature 15 may 1997 pg 256

Forests provided ecological services on the order of \$300 per hectare per year. Wade Roush, Science May 16 1997 pg 1029

Those services include: Species protection (Think of what it costs to keep an endangered animal alive in a zoo, compared to a native habitat), storm protection, flood control, drought recovery and other aspects of habitat response to environmental variability mainly controlled by

vegetation structure, prevention of loss of soil by wind, runoff or other removal processes, soil formation, nutrient cycling, waste treatment, pollution control, detoxification, atmospheric gas regulation, climate regulation, pollination, dynamic regulation of populations, reduction of herbivory by top predators, habitat for resident and transient populations, food, lumber, fuel and fodder production; medicine products, genes for disease resistance, ornamental species, eco-tourism, sport fishing, and other outdoor activities, aesthetic, artistic, educational, spiritual and scientific values.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Forest Ecosystem Services Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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33. Please list, describe and quantify all Construction impacts related to this one.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 705 - LOGGING CAUSED BIOMASS LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Logging caused Biomass Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Logging caused Biomass Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 706 - LOGGING CAUSED BIODIVERSITY CHANGE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Logging caused Biodiversity Change.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Gaps left by single-tree loggers had less shade and higher peak temperatures (95 degrees vs. 79 degrees) than natural tree falls. Such a change might have a variety of consequences. For example, the researchers found that the higher temperatures attracted heat-loving lizards. These predators sunbathe and then lunch in the surrounding forest. More sunny spots - and more lunching lizards-might threaten both their prey and competitors." Vitt, Conservation Biology, June 1998
reported in Science News June 20, 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Logging caused Biodiversity Change.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 707 - LOGGING CAUSED BIODIVERSITY LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Logging caused Biodiversity Loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Logging caused Biodiversity Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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* 708 - LOGGING CAUSED SPECIES AND HABITAT LOSS.

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the project's potential impacts on Logging caused Species and Habitat Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Logging caused Species and Habitat Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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-

*** 709 - LOGGING CAUSED SOIL DAMAGE.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Logging caused Soil Damage.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Logging caused Soil Damage.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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-

*** 710 - LOGGING CAUSED SOIL COMPACTION.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Logging caused Soil Compaction.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Logging caused Soil Compaction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,

credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the

baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 711 - LOGGING CAUSED EROSION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Logging caused Erosion.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Logging caused Erosion.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 712 - LOGGING CAUSED FLOODING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Logging caused Flooding.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

On January 21, Dean Lucke, Assistant Deputy Director for Forest Practice of the California Department of Forestry (CDF) wrote a letter to John Campbell, president of the Pacific Lumber Company (PL) stating,
"Freshwater and Elk River are experiencing an increased rate of flooding and sedimentation that corresponds with the current cycle of logging in these watersheds. The increase in peak flows following a rainfall event appears to be a cumulative effect of timber harvesting."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Logging caused Flooding.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,

credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 713 - LOGGING CAUSED GROUNDWATER LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Logging caused Groundwater loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The famous 1960's Hubbard Brook Experiment in New Hampshire by Bormann and Likens found that logging an entire valley has major impacts when compared to a natural valley.

The logged and herbicided valley had a 30 to 40 percent increase in water runoff as compared to the unlogged forest.

The amount of nutrients leaving the untouched natural forest ecosystem by way of the creeks was roughly equal to the dissolved nutrients entering the ecosystem in rain and snow. -Living in the Environment, G. Tyler Miller pg 122

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Logging caused Groundwater loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
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45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 714 - LOGGING CAUSED NUTRIENT AND ORGANIC MATTER DEPLETION.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Logging caused Nutrient and Organic Matter Depletion.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The famous Hubbard Brook Experiment in New Hampshire by Bormann and Likens found that logging an entire valley has major impacts when compared to a natural valley.

The logged and herbicided valley had six (6) to eight (8) times the loss

of minerals in the unlogged forest.

The logged and herbicided valley had 60 fold increase in Nitrate ion loss as opposed to the unlogged forest.

The logged and herbicided valley had six fold increase in Calcium ion loss as opposed to the unlogged forest.

The logged and herbicided valley had 15 fold increase in Potassium ion loss as opposed to the unlogged forest.

So much nitrogen was lost from the experimental valley the overfertilized stream below became covered with populations of cyanobacteria and algae.

The amount of nutrients leaving the untouched natural forest ecosystem by way of the creeks was roughly equal to the dissolved nutrients entering the ecosystem in rain and snow.
-Living in the Environment, G Tyler Miller pg 122

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Logging caused Nutrient and Organic Matter Depletion.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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33. Please list, describe and quantify all Construction impacts related to this one.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 715 - LOGGING CAUSED ALGAE GROWTH.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the project's potential impacts on
Logging caused Algae Growth.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The famous Hubbard Brook Experiment in New Hampshire by Bormann and Likens found that logging an entire valley has major impacts when compared to a natural valley.

The logged and herbicided valley had a 30 to 40 percent increase in water runoff as compared to the unlogged forest.

The logged and herbicided valley had six (6) to eight (8) times the loss of minerals in the unlogged forest.

The logged and herbicided valley had 60 fold increase in Nitrate ion loss as opposed to the unlogged forest.

The logged and herbicided valley had six fold increase in Calcium ion loss as opposed to the unlogged forest.

The logged and herbicided valley had 15 fold increase in Potassium ion loss as opposed to the unlogged forest.

So much nitrogen was lost from the experimental valley the overfertilized stream below became covered with populations of cyanobacteria and algae.

The amount of nutrients leaving the untouched natural forest ecosystem by way of the creeks was roughly equal to the dissolved nutrients entering the ecosystem in rain and snow.
-Living in the Environment, G Tyler Miller pg 122

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Logging caused Algae Growth.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

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18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
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46. Please provide the reverse of this impact as Mitigation.
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- * 716 - LOGGING CAUSED SILTING OF CREEKS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Logging caused Silting of Creeks.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Logging caused Silting of Creeks.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergistic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 717 - LOGGING CAUSED FRAGMENTATION.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Logging caused Fragmentation.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Logging caused Fragmentation.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 718 - LOGGING CAUSED INCREASED EDGE EFFECTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Logging caused Increased Edge Effects.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Logging caused Increased Edge Effects.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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 - 30 Please describe all potential CUMULATIVE impacts related to this one.
 31. Please quantify all potential CUMULATIVE impacts related to this one.
 32. Please list, describe and quantify all potential compound and synergetic impacts.
 33. Please list, describe and quantify all Construction impacts related to this one.
 34. Please list, describe and quantify all Growth impacts related to this one.
 35. Please list, describe and quantify all Indirect impacts related to this one.
 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
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 41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
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 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 719 - LOGGING CAUSED LOSS OF VERTICAL DIVERSITY.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Logging caused Loss of Vertical Diversity.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Logging caused Loss of Vertical Diversity.
 - 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
 - 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
 - 3b. Please quote the definition used.
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 - 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
 - 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
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 10. Please state whether this MARGIN of ERROR is measured or assumed.
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 12. Please state the most extreme values which could be encountered.
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 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
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 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 720 - LOGGING CAUSED LOSS OF COOLING SHADE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Logging caused Loss of Cooling Shade.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Gaps left by single-tree loggers had less shade and higher peak temperatures (95 degrees vs. 79 degrees) than natural tree falls. Such a change might have a variety of consequences. For example, the researchers found that the higher temperatures attracted heat-loving lizards. These predators sunbathe and then lunch in the surrounding forest. More sunny spots - and more lunching lizards-might threaten both their prey and competitors." Vitt, Conservation Biology, June 1998
reported in Science News June 20, 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Logging caused Loss of Cooling Shade.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

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12. Please state the most extreme values which could be encountered.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 721 - LOGGING CAUSED INCREASE IN SOIL EXPOSURE TO SUN AND ITS LEACHING INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Logging caused Increase in Soil Exposure to Sun and its Leaching Increase.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Logging caused Increase in Soil Exposure to Sun and its Leaching Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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*** 722 - LOGGING CAUSED REDUCED PRODUCTIVITY AND INCREASE OF NON-NATIVE SPECIES.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on

Logging caused Reduced productivity and increase of non-native species.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Logging caused Reduced productivity and increase of non-native species.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 723 - FOREST LOSS.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Forest Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Dr. Robert Repetto, senior economist at the World Resources Institute, a Washington research organization, calculated the "loss of value from [Indonesian] deforestation was four times as high as the value of timber extracted." New York Times, Science Times Tuesday May 20, 1997

Logging Impacts
The harmful negative effects of logging include: Loss of biomass, loss of biodiversity, loss of species and habitat, soil damage, soil compaction, erosion, landslides, nutrient and organic matter depletion, silting of creeks, increased edge effects, fragmentation, loss of vertical diversity, loss of cooling shade, increase in soil exposure to sun and attendant leaching increase, acidification, loss of nitrogen,

toxic runoff from petroleum products in asphalt roads, dust covering plants from dirt roads, reduced productivity and increase of non-native species and all of the above's cumulative contribution to loss of forest quality.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Forest Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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* 724 - FOREST ECOSYSTEM LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Forest Ecosystem Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Forest Ecosystem Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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* 725 - FOREST FRAGMENTATION INCREASE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Forest Fragmentation Increase.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective

(non-subjective) CRITERIA used to determine the impact significance on Forest Fragmentation Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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4. If no measurement units are used please state that clearly.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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* 726 - FOREST EDGE EFFECT INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Forest Edge Effect Increase.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Edge habitats have been well-demonstrated to differ from core habitats in several ecological systems." US-FWS Marbled Murrelet 1997

Edge Effects & Weather
"Edge effect" describes how trees at a new edge of a forest, where trees have been cut for timber or roads or subdivisions, are exposed to much higher wind gusts - which knocks them over prematurely, and erosion which exposes roots, and loss of wildlife and biodiversity necessary to sustain a healthy forest.

Forests near induced edges, for example, may have a higher density but lower diversity of birds than the interior forest. A number of studies have shown increased predation of songbird and quail eggs near forest edges. The predation is worst near developed areas (which might have unnaturally high populations of cats, raccoons, skunks, jays an crows)."
- Mitch Lansky "Beyond the Beauty Strip"

There are three kinds of edge effect simply described: 1) trees cut in a forest, 2) roads cut in a forest, 3) Urban development next to a forest.

Please identify by mapping which of each of these effect exist now and how they will change if the project is approved.

Please identify and map the length of each edge of forest and the amount of forest affected by different impacts such as barking dogs, dogs running loose, lights from homes, noise from roads.

Please identify the length of the new edge for each subdivision after the proposed development and map and detail the number of acres that have been lost that were previously unaffected by edge.

Please detail any proposed mitigation of micro-climate (tiny and very local weather) changes near roads and homes.

Please describe the health of the forest when it is reduced to "Islands"

(where there may no longer be any true forest interior).

Please describe the "Edge effects" of rain and heightened erosion on the remaining trees after the forest is cut down.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Forest Edge Effect Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 727 - FOREST LOSS FROM WINDTHROW.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Forest loss from Windthrow.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Windthrow occurs when trees are knocked down by wind and killed because of the removal of a forest's natural soft edges and the creation of sharp man-made edges to a forest. The sharp man-made edges of a forest and loss of the soft natural edge of a forest is typically caused by logging, road building or clearing for buildings. In a natural forest the canopy and trunks of a forest are sheltered from direct impact of high winds.

Windthrow is an indirect but real and predictable impact which kills more trees than those which are logged.

"Windthrow can knock down Monterey pines from 300 meters to a mile from a newly cut edge of a forest." - Prof William Libby, UC Berkeley
Professor Emeritus Forest Genetics - personal contact 1995.

"The approximately 9 acres of native Monterey pine forest to be cleared for the golf course represents a substantial long-term impact. Additional loss of trees is likely to result from 'windthrow', as the cleared area behind the first rank of trees is roughly perpendicular to the site's strong prevailing winds." - Monterey County's Spanish Bay Project Final approval 1984 pg 25.

Please quantify and map the areas expected to experience forest loss from windthrow in addition to that caused by planned tree cutting.

Please describe the "Edge effects" of wind on the remaining trees after the proposed forest cutting is finished.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Forest loss from Windthrow.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 728 - MICROBIOTIC CRUSTS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Microbiotic Crusts.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

SOIL MICROBIOTIC CRUSTS ECOSYSTEM VALUES

Belnap, Jayne 1990 Microbiotic Crusts: Their Role In Past and Present Ecosystems Park Science: a Resource Management Bulletin

Soil microbiotic crusts have a large role in maintaining healthy soils, especially in the arid west. Microbiotic soil crusts help stabilize soils, trap and hold soil nutrients thus enriching the soil, fix atmospheric nitrogen to again enrich the soils, and colonize disturbances such as lava flows first. Human activities and uses such as grazing can seriously damage these crusts.

Fletcher, J.E. and Martin, W.P. 1948 Some effects of algae and molds in the rain-crust of desert soils, Ecology 29:95-100

Soil crusts are found to help stabilize the soil, improve infiltration, decrease erosion, and aid in the establishment of seedlings in desert environments. These crusts demonstrate an increase in soil organic content of up to 300%, and increases in soil nitrogen content of up to 400%, where crusts are highly developed. Nostoc algae, a nitrogen fixer, was present where the largest increases in soil nitrogen were found.

Brotherson, J.D. and Rushforth, S.R. 1983 Influence of Cryptogamic Crusts on Moisture Relationships of Soils in Navajo National Monument, Arizona, Great Basin Naturalist 43(1): 73-78

Cryptogamic crusts were found to increase the depth of water penetration

into the soil, decrease runoff, and lower water infiltration rates into the soil. These crusts are thought to be as important in desert ecosystems for their role in water conservation as for their role in reducing erosion.

Loope, W.L. and Gifford, G.F. 1972 Influence of a soil microfloral crust on select properties of soils under pinyon-juniper in southeastern Utah, Journal of Soil and Water Conservation :164-167

Cryptogamic crusts are found to decrease soil permeability, especially when irrigated, and increase soil infiltration rates. Sedimentation production also tends to increase once crusts have been disturbed.

Jeffries, D.L., Klopatek, J.M., Link, S.O., and Bolton, H. Jr. 1992 Acetylene reduction by cryptogamic crusts from a blackbrush community as related to resaturation and dehydration, Soil Biology and Biochemistry 24:1101-1105

Study of rates of nitrogen fixation in cryptogamic crusts in ungrazed, lightly, and heavily grazed areas of blackbrush community. Cryptogamic crusts fix a significant amount of nitrogen in these communities. Moderate and heavy grazing significantly reduces the amount of nitrogen fixed, and this could be the reason why grazed areas show such long recovery times in this community.

GRAZING HARM TO SOIL MICROBIOTIC CRUSTS Hogan, David 1994 Cryptogamic Doomsday, Wild Earth

The argument is made that cryptogamic crusts are essential to the stability of western arid ecosystems. It is also noted that livestock grazing is the single largest factor in the destruction of these soil crusts. It is recommended that grazing be stopped on all arid western lands.

Anderson, D.C., Harper, K.T., and Rushforth, S.R. 1982 Recovery of Cryptogamic Soil Crusts from Grazing on Utah Winter Ranges Journal of Range Management 35(3):355-359

(From the conclusion:) "Our data demonstrated that cryptogamic cover is severely reduced by domestic grazers. Both the number of cryptogamic species and their contribution to the total cover suffer under the hooves of grazing animals." Cryptogamic soil organisms were found not to compete with or affect numbers of vascular plants in the area.

Kleiner, E.F., and Harper, K.T. 1977 Soil properties in relation to cryptogamic groundcover in Canyonlands National Park, Journal of Range Management 30(3):202-205

Study of two areas, one never grazed, one continuously grazed lightly in winter for decades and stopped five years previous. Cryptogamic cover

was significantly higher in the protected area. Soil nitrogen and phosphorous were also higher in the protected area, as was the amount of organic litter. Analysis points to grazing as the cause of the loss of the cryptogamic crust and other vegetational differences between the two areas.

Beymer, R.J., and Klopatek, J.M. 1992 Effects of Grazing on Cryptogamic Crusts in Pinyon-Juniper Woodlands in Grand Canyon National Park, American Midland Naturalist 127:139-148

Cryptogamic crusts demonstrate a significant decline in presence and biomass from grazing pressures. Reduction in the percent cover of cryptogamic soils crusts also correlates with a reduction in cover for the dominant grass species (mutton grass), which is preferred by cattle. Recommends grazing decisions and policy consider cryptogamic soil crusts as an indicator of ecosystem condition.

Brotherson J.D., Rushforth, S.R., and Johansen, J.R. 1983 Effects of Long-term Grazing on Cryptogam Crust Cover in Navajo National Monument, Arizona, Journal of Range Management 36(5):579-581

Cryptogamic crusts were compared in areas grazed and areas removed from grazing for forty years. Grazing was found to significantly lower the cover values of cryptogamic species. Mosses and lichens are more heavily impacted than algae. Authors recommend grazing policies be modified to manage for and encourage cryptogamic crust formation and maintenance.

Dunne, J. 1989 Cryptogamic soil crusts in arid ecosystems, Rangelands 11:180-182

This article gives a description of the role of cryptogamic crusts in arid ecosystems. Noted are the importance of these crusts for reducing erosion and soil stabilization, and nitrogen fixing. Other research quoted has shown these crusts are seriously harmed by grazing, and a removal of cattle causes a slow recovery of the crusts, with a resulting lowering of erosion, sedimentation and an increase rate of infiltration. The report concludes that range managers have yet to address issues of cryptogamic soil protection in livestock management plans or policies.

Johansen, J.R. and St. Clair, L.L. 1986 Cryptogamic soil crusts: recovery from grazing near Camp Floyd State Park, Utah, USA, Great Basin Naturalist 46(4):632-640

Comparisons are made between cryptogamic crusts in an area protected from grazing for seven years and an area protected from grazing for twenty years. Although for algae, the sites were similar in terms of degree of crusting, significant differences in major group frequencies

were found, with the more recently grazed site having a lower algal frequency. Moss and lichen communities had significantly less cover and diversity in the more recently grazed areas than in the area protected for twenty years. Recovery of the more recently grazed site was deemed to be as yet incomplete.

Lesica, P. and Shelley, J.S. 1992 Effects of cryptogamic soil crust on the population dynamics of *Arabis fecunda* (Brassicaceae), American Midland Naturalist 128:53-60

Cryptogamic soil crusts increase survival for juvenile and adult *Arabis fecunda* plants. Due to its small seed size, this may be more beneficial to the plant than increased germination. Although cattle do not eat the plant, trampling damage to the plant and to the crust is likely to lower the distribution of this already rare plant.

Jeffries, D.L. & Klopatek, J.M. 1987 Effects of Grazing on the Vegetation of the Blackbrush Association, Journal of Range Management Vol. 40 (5): 390- 392.

In ungrazed fields densities of microtine prey were significantly higher than in mowed or mowed-grazed fields. Similar results to Kunkle and Meiman (1968). Riparian zones important; water, easy terrain, cover, microclimate and palatable forage. This attracts wildlife, livestock and people - road location, creation, water use, mining. Unwise reduction in cover of other species. Recovery of cryptogamic soil crusts was virtually nonexistent on the protected site, even after 6 years of above average rainfall.

Anderson, D. C., Harper, K. T., and Holmgren, R. C. 1982 Factors Influencing Development of Cryptogamic Soil Crusts in Utah Deserts Journal of Range Management 35(2):180-185

Grazing by sheep was found to reduce the area covered by and the diversity of species found in cryptogamic soils. Cryptogamic soil formation was found to be dependent on the physical properties of the soils. Cryptogamic soils exert a widespread influence to stabilize soils where they occur. Grazing during the dry season may cause damage to the cryptogamic crust that prevents the re-establishment of necessary algal species. The authors conclude: "Pragmatically, any domestic grazing use may prove to be incompatible with highly developed cryptogamic crusts such as those occurring in Virginia Park of Canyonlands National Park.

QUANTIFICATION OF BASELINES AND IMPACTS:

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* 729 - INABILITY OR FAILURE TO ENFORCE CONDITIONS OF APPROVAL.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Inability or Failure to Enforce Conditions of Approval.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

According to Dale Ellis, Monterey County Code Enforcement Supervisor at a Carmel Valley Town Hall meeting Aug 30 1999, the County approves some 300 Discretionary permits per year and each permit has an average of 25 conditions. This is some 7,500 NEW conditions every year and some 75,000 conditions approved for the past decade.

Mr. Ellis also stated at that public meeting that his office gets some 350 complaints of condition violation per year and that his office
"Doesn't come close to dealing with all of them."

CEQA Section 21081.6(b) states
"A public agency SHALL provide that measures to mitigate or avoid significant effects on the environment are FULLY ENFORCEABLE...."

My dictionary defines "enforce" as "able to impose performance."
1) All conditions must have a numeric goal and a completion date.

Non Quantified Mitigations and Conditions can not be enforced.

When a condition has no numeric, or completion date, performance goals it is not possible to objectively, or judicially, determine whether the goal has been achieved. This makes that condition unenforceable failing the CEQA Section 21081.6b mandate.

2) Monterey County has no process or method of tracking or enforcing conditions of project approval.

a. The 1997 Monterey County Grand Jury reports found that Monterey County Planning can not provide any evidence of a method or ability to merely MONITOR condition compliance on a development project after they are approved, let alone enforce conditions.

Grand Jury report Jan 5 1998 pg 36 (Recommendation 5):
"The [Planning and Building Inspection Department] develop a system for keeping track of and reporting on a regular basis how long it takes from the time a ... complaint is filed until the matter is settled."

b. The County has no place to look up an approved project's conditions and whether each condition has been met or not.

Grand Jury report Jan 5 1998 pg 36 (Recommendation 6):
"The [Planning and Building Inspection Department] accept the responsibility and devise a careful system for making sure that all conditions imposed on a building permit or subdivision permit are, in fact, fully met."

Lacking a system of tracking condition compliance, Monterey County can not reasonably assert that any conditions will be met.

3) Monterey County has repeatedly failed to enforce conditions of approval.

a. The 1997 Monterey County Grand Jury reported that the Rancho Chualar 1 Project did not fulfill its conditions of approval EVEN THOUGH THE COUNTY SIGNED OFF ON A LEGAL DOCUMENT THAT THEY HAD.

Grand Jury report Nov 25 1997 pg 6:
"There is no evidence that the county made any attempt to verify, by inspection, that the conditions in fact have been met [for Rancho Chualar 1]. THERE IS CLEAR EVIDENCE THAT SOME OF THE CONDITIONS HAVE NOT BEEN MET [FOR RANCHO CHUALAR 1]."

Grand Jury report Nov 25 1997 pg 6:
"... the County has already agreed that the developer has met all the commitments of [Rancho Chualar 1]."

b. Grand Jury report Jan 5 1998 pg 34 (4c):
"A subdivision was approved and constructed, but the plans for complying with the special conditions of approval were not provided for a year after the construction of the subdivision was begun. MUCH of the work to comply with the CONDITIONS OF APPROVAL REMAINS UNDONE TO THIS DAY, YEARS AFTER THE SUBDIVISION WAS COMPLETE AND OCCUPIED."

c. In 1994 when I asked about the status of a 1984 project's conditions (Pebble Beach's Spanish Bay), a project Planner told me "We don't have a list of the conditions and so we can't tell you whether they've been completed."

d. In Fall 1997 when I tried to find the list of conditions for Markham Ranch Phase 3, I was told by Planning Department staff (several times)
"We can't find the Markham Ranch Phase 3 file (at all). All we have is the file on Phases 1 and 2." In addition I was told "There is no planner in charge of that project." Whatever the reasons are for failing to enforce conditions, failing to enforce them shows a pattern of behaviour that is impermissible under CEQA Section 21081.6(b).

e. Two letters to the editor in the March 24, 1998 Monterey County Herald show how County "Planning" arrogantly refuses to make or enforce

adequate runoff mitigation conditions on a project in Carmel Valley.

d. In Fall 2002, Monterey County approved 2.5 miles of illegal bulldozing after-the-fact by the Kleisners that seriously damaged steelhead and red-legged frog habitat in Joshua and Garrapata Creeks in Big Sur.

e. Also in Fall 2002, Monterey County approved the Investmark development even though they had twice done heavy logging after their permit expired.

4) Monterey County removes substantial conditions and zoning, quietly, without meaningfully notifying the outraged public.

1. Canada Woods East had a "Permanent Scenic Easement" removed from the land by the Board of Supervisors with no meaningful public notice.

2. Rancho Chualar 1 had a "Permanent Agricultural Conservation Easement" removed with a possibly misleading description as an item on the Board of Supervisors consent calendar. This was five years after the condition was imposed on the project. Project opponents were not notified.

5) Conditions must be Citizen Enforceable. In order to be fully enforceable, a developer's failure to perform conditions must be able to be brought by a citizen before a judge.

When Monterey County has the authority to enforce mitigation conditions and they, however accidentally or neglectfully fail to, or chose not to monitor or enforce a condition, that condition is not "fully enforced" or fully enforceable.

There is no law allowing citizens to enforce conditions of project approval.

There is no law preventing the County from allowing citizen enforcement of project conditions.

Thus any conditions imposed by Monterey County are not "Fully Enforceable" as required by CEQA Section 21081.6b unless each can be brought by a citizen before a judge.

All of the above is Substantial Evidence showing that Monterey County, for whatever reasons (whether they are incapable of or unwilling to), do not monitor or enforce conditions of project approval to be able to "fully enforce" them.

Thus NO conditions imposed by Monterey County can be reasonably claimed to be "FULLY ENFORCEABLE" as required by CEQA Section 21081.6b unless they contain citizen enforcement provisions.

Until Monterey County can demonstrate an ability to fully enforce conditions of past approvals no new conditions, lacking citizen

enforcement provisions are legal under CEQA Section 21081.6b.

Only when Monterey County can either -
1) increase enforcement to adequately monitor all approved conditions, or
2) stop or reduce approvals to the level of the County's capacity to monitor and enforce all approved conditions can CEQA's 21081.6b requirement be achieved.

QUANTIFICATION OF BASELINES AND IMPACTS:

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* 730 - ENFORCABLE CONDITIONS.

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Enforcable Conditions.

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this impact please explicitly state the page number and paragraph.

Enforcable Conditions should include -

1. Permits for each potentially harmful activity.
2. For causing harm - A Fine of five times the potential profits.
3. For large harm -
* Large Fine - 10 - 25 times the size of the potential profits, plus
* Lose permit for a year or more.
4. For egregious or second violation -
* Large Fine - 100 times the size of the potential profits, plus
* Lose permit for life.
5. All Equipment is seized and sold.
6. For an extreme or third violation -
* All the above plus
* Jail time.

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Enforcable Conditions.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 731 - COMPUTER MODEL DATA AND CONCLUSIONS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Computer Model Data and Conclusions.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

A lot of public policy decisions are now hidden by use of computer models.

The DEIR uses computer models for Air pollution and Noise estimations and calculations.

"The bed fits, not because it is cleverly built to size, but because it cuts off your feet." P. Huber

"Although the precise numbers and realistic pictures produced by computer simulations give an illusion of accuracy, a ravening swarm of assumptions, simplifications, and outright errors lurk beneath."

This "is not the old science fiction cliché of supersmart machines shucking the shackles of humanity, but rather semi-stupid [software] programs placed in positions of responsibility - a kind of digital Peter Principle, in which computers rise to their level of incompetence." -Science, 11, Feb, 2000 Vol 287 pg 960

I often critique computer models when they are used in government studies. My background includes employment as senior design engineer for an English race car manufacturer (Eldon), at least twelve years study of higher math and applied physics and 30 years as a computer scientist - (incidentally I created an award winning software product (in PC Magazine's Editor's Choice Box 1990 - and yet I don't always understand the comic strip B.C. - oh well.) The following quotes are from a standard reference I use. The quoted material is from Prof Stermann of MIT. The narrative and questions are mine.

I find a vast distinction between software for standard commercial purposes and software used to make public policy decisions (Perhaps we should refer to confidential public policy making software as half-vast). Commercial software should and does have absolute copyright protection from reverse engineering. However, software used for making public policy should have no such immunity when its data and processes are secret.

DATA REQUIRED

Skepticism of the computer model results can be valid, but even if wrong, those asserting the results cannot refute your critique unless they disclose their data and process.

INDEPENDENT VERIFICATION IMPOSSIBLE

All results from commercial software (accounting, word processing, spreadsheets, graphics, statistics etc.) can be independently verified much like you can independently verify your grocery shopping receipt. The reason is that although your grocery shopping receipt doesn't often explicitly tell you the method it uses, it does provide you with all the facts (or data). The implication is that only addition, subtraction and multiplication are used in entirely deducible method.

In sharp contrast, because computer models, and especially those used to suggest public policy, are almost always custom made (or task specific), their results cannot be independently verified.

Unless the facts and reasoning used and probably more importantly those not used - are known. Those facts and reasoning are known in the programming world as data, assumptions and procedures.

Because of their typical "black box nature" if a computer model's data, assumptions and procedures are not publicly available for inspection the model author/programmer could give you any science fiction answer, result or conclusion they want. If, as is so common, a public agency relies on the "expert's" conclusions the model's authors could be creating or skewing public policy.

ENVIRONMENTAL PROCEDURES LAWS REQUIRE FACTS

Both the national environmental policy law (NEPA) or your state environmental procedures law (if you have one) require the disclosure of a computer models' data, assumptions and procedures. Most environmental procedures laws require the decision based upon facts and reason and prohibit mere speculation or opinion. If data and reasoning are not disclosed, the conclusions are legally barred because they have no more value than voodoo.

COMPUTER MODELS MISLEADING

From: A Skeptics Guide to Computer Models by Dr. John D. Stermann Westview Press 1991:

"Because computer models are so poorly understood by most people, it is easy for them to be misused, accidentally or intentionally. Thus there have been many cases in which computer models have been used to justify decisions already made and actions already taken, to provide a scapegoat when a forecast turned out to be wrong, or to lend specious authority to an argument."

Computer models are often less than ideal:

"They are so poorly documented and complex that no one can examine their assumptions. They are black boxes."

"They are so complicated that the user has no confidence in their consistency or conclusions."

"They are unable to deal with relationships and factors that are difficult to quantify, for which numeric data do not exist, or that lie outside the expertise of the specialists who built the model."

"No one can (or should) make decisions on the basis of computer model results that are simply presented, "take 'em or leave 'em." In fact, the primary function of model building should be educational rather than predictive."

1) Please avoid computer models unless the models and their documentation are made fully, and without charge, available to the public with specific hearing time set aside for a discussion of each model's value and problems.

The following checklist (courtesy of Prof John Stermann) outlines some of the key questions that should be answered to evaluate the validity of a model and its appropriateness as a tool for solving a specific problem. Please answer the following questions for each computer model used in your document:

Is the model documented?
Is the documentation publicly available?
Can third parties use the model and run their own analyses with it?

How has the model been reconciled with empirical tests?

What specific version of the model is to be used?

How will public notice take place if the model is ever modified - even slightly (e.g. for bug fixes)?

What is the problem at hand?
What problem is addressed by the model?
What problems are not addressed by the model?

What is the boundary of the model?
What factors are endogenous?
What factors are exogenous?
What factors are excluded?
Are soft variables included?
Are feedback effects properly taken into account?
Does the model capture possible side effects, both harmful and beneficial?

What is the time horizon relevant to the problem?
Does the model include as endogenous components those factors that may change significantly over the time horizon?

Are appropriate time delays taken into account?
Are appropriate constraints taken into account?
Are appropriate potential bottlenecks taken into account?

Is the model robust in the face of extreme variations in input assumptions?

How sensitive are the policy recommendations derived from the model to plausible variations in its assumptions?

Are the results of the model reproducible? Or are they adjusted (add factored) by the model builder?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Computer Model Data and Conclusions.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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33. Please list, describe and quantify all Construction impacts related to this one.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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* 732 - TREE CANOPY (VERTICAL DIVERSITY) HABITAT LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Tree Canopy (Vertical Diversity) Habitat Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"A study in Oregon found 66 invertebrate species in an old-growth forest canopy and only 15 in the canopy of a younger forest. Furthermore, few of the species in the young forest were insect predators. This is important because predatory and parasitic species in older forests help check the proliferation of insects that could potentially do widespread damage." (Beyond the Beauty Strip, Mitch Lansky 1992, Tilbury House citing Tim Schowalter, "Insects and Old Growth," Forest Planning Canada, Vol 5 1990:5)

This could help explain why old-growth Monterey pine forests seem resistant to Pine Pitch Canker (PPC) while younger and fragmented stands appear more susceptible.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Tree Canopy (Vertical Diversity) Habitat Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 733 - LOSS OF TALL SNAGS FOR BIRD ROOSTING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Loss of Tall Snags for Bird Roosting.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Dead trees are so important to the functioning of forest ecosystems that Maine wildlife biologist Mac Hunter devoted an entire chapter to the subject in his recent book "Wildlife, Forests, and Forestry: Principles of Managing Forests for Biological Diversity. Snags create important habitat for many species of birds, insects and mammals. Cavity nesting species such as woodpeckers and nuthatches help control insects (e.g. bark beetles) that could cause significant tree mortality if unchecked. Owls and aAmerican Kestrels, which often live in cavities created by woodpeckers, help control prolific small mammals that could wipe out conifer seeds and severely reduce regeneration." Beyond the Beauty Strip, Mitch Lansky 1992, Tilbury House

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Loss of Tall Snags for Bird Roosting.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 734 - FOREST CLEARING ALLOWING OFF-ROAD VEHICLE TRAVEL / PARKING AND SOIL DAMAGE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on

Forest clearing allowing Off-road Vehicle Travel / Parking and Soil Damage.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Forest clearing allowing Off-road Vehicle Travel / Parking and Soil Damage.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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* 735 - GOWEN CYPRESS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Gowen Cypress.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

This is a Federally listed Threatened species as of August 1998
(Cupressus govenia ssp. govenia). Monterey County is well within the
range of this species.

The proposed equestrian center will directly kill several Gowen
Cypresses. The impacts of horses and increased trail usage will further
degrade this imperiled species and its native habitat.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Gowen Cypress.

1b. If no objective criteria are used please state that clearly.

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24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

We request that the Federal Register (or state equivalent) announcement of the listing of this species, and where the species is state listed the equivalent state public notice, be made a part of this review and considered.

ENDANGERED SPECIES

This project site appears to meet all three US-FWS criteria indicating the potential to find the species or its habitat on the project site.

SPECIES RANGE

1. Please provide a map of this species geographic range. Please use Venn diagrams as used in the FWS & NMFS March 1998 ESA Consultation Handbook pg pgs 4-16/4-17.

LOCAL OBSERVATIONS

2. Please provide a map of this species' habitat, local to the project.

3. Please identify all recent observations of the species on the local habitat map.

4. Please describe whether the population(s) affected by this project is a source or a sink population.

HABITAT TYPES AND RANGE

5. Please provide a comprehensive description of all of the species' known habitats, including foraging and migration habitats.

6. Please provide a comprehensive description of the maximum distance the species has been observed from known nesting, breeding and foraging habitats.

MINIMUM VIABLE POPULATION

7. Please describe the size of land area needed to sustain a single breeding pair (or an asexual individual) of this species for 100 years.

8. Please describe the number of individual breeding pairs (or individuals) needed to sustain a minimum viable population for 100 years.

9. What margin of error do these numbers have?

10. Please describe the size of land area needed to sustain a minimum viable population for 10 generations of this species.

VULNERABILITY AND THREATS

11. Please describe all characteristics of this species which make it vulnerable to extinction (e.g. specialized feeding habits, limited or specialized distribution, occupies top trophic levels, low reproductive potential, or hunted for commercial products).

12. Please identify, quantify and describe all major, moderate and potential threats to the species, in order of priority, which can limit the carrying capacity and population productivity factors for this species (e.g. loss of habitat, pesticides).

ONSITE HABITAT SIZE & QUALITY

13. Please quantify and describe the species maximum potential onsite habitat size in acres.

14. Please quantify the size of the species habitat which could be potentially lost in acres both permanently and temporarily.

15. Please quantify the number of individuals of this species which could potentially be lost and which impacts could cause each loss.

16. Please describe the qualities of each area of the habitats which could be lost, and which specific impacts could cause each loss.

FOOD CHAIN

17. Please describe and quantify the food chain for this species

18. Please discuss whether the listed species is a generalist or a specialist which only eats one species of food and if that food will be impacted by the activity.

19. Please describe and quantify the potential impacts, decrease and losses of the species' food chain due to the project.

PREDATORS

20. Please describe and quantify the potential impacts, declines and losses of the listed species from predators of the species which may be assisted by the project.

BIODIVERSITY

21. Please quantify and describe the existing Genetic Biodiversity for this species. Please quantify the existing genetic breadth using the number of variants of this species' Microsatellite DNA. If such studies do not exist please state this clearly.

22. Please quantify the potential reduction in size of the genetic variants in this species' Microsatellite DNA.

23. Please analyze and quantify the potential genetic bottleneck impacts on this species from this project.

24. Please quantify the potential reduction in size of the Species' Genetic Biodiversity due to this project.

25. Please quantify the Species' existing non-genetic Biodiversity.

26. Please quantify and describe the existing Ecosystem Biodiversity this species inhabits.

27. Please quantify and describe the potential reduction in size of the Species' Biodiversity due to this project.

* 736 - GOWEN CYPRESS HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Gowen Cypress Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Gowen Cypress Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20a. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 737 - NATIVE MONTEREY PINE (P. RADIATA) TREE LOSS.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Native Monterey Pine (P. radiata) Tree Loss.
- If you claim the document contains proof of no-significant-impact for
- this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Native Monterey Pine (P. radiata) Tree Loss.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 738 - PLANTING X ACRES OF MONTEREY PINE TREES.

Trees alone are not a forest, and planting trees, while environmentally generally a step in the right direction, does not make a forest. A

forest is a dynamic ecological system of interdependent species and habitats.

"Simply planting trees does not compensate for the loss of the habitat because many other factors affect whether a habitat is ecologically valuable." US-Fish & Wildlife Service, letter on mitigating loss of Monterey Pine habitat to Monterey County, Jan 19, 1996

Health
A tree farm can have healthy trees as does a native forest. But, a healthy tree does not make a healthy forest.

The genetic diversity difference between a forest and planted trees is enormous. A natural forest has as much genetic diversity as the number of trees it contains. Planted trees are typically clones with identical genes - all the trees are essentially twins.

The biological diversity of a natural forest is broad, complete and stable. The biological diversity of planted trees is extremely narrow, almost incomplete and instable.

How many species in a Tree Farm? How many species in a Healthy Forest?

The biomass of a natural forest is large and almost unvarying.
The biomass of planted trees is tiny and changing.

Myth: Dead and dying trees are bad for a forest.
What's Beethoven doing right now? - Decomposing.
While a healthy forest is full of healthy live trees, a Healthy Forest is also full of death, decay and rot.

Snags
How many dead standing trees in a tree farm? Generally Zero.
How many dead standing trees in a natural forest? Several per acre.
Woodpeckers eat insects including bark beetles which are primary

suspects of Pine Pitch Canker transmission. Woodpeckers need snags to live in. Urban Forests do not have snags. Urban Forests have more Pine Pitch Canker.

Cleared underbrush?
A forest which has had its ground cover vegetation artificially removed is not a healthy forest.

Dead Fallen logs?
After a tree falls it becomes home to other insects, bacteria, and animals. It decomposes to become food for the rest of the forest.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Planting X acres of Monterey Pine Trees.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
Planting X acres of Monterey Pine Trees.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
Planting X acres of Monterey Pine Trees.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Planting X acres of Monterey Pine Trees.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Planting X acres of Monterey Pine Trees.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
Planting X acres of Monterey Pine Trees.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of

them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 739 - NATIVE MONTEREY PINE BIOMASS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Native Monterey Pine Biomass.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

According to the PG&E Forester for this area, Stuart Craig, a mature Monterey pine typically weighs about 5 tons (ten thousand pounds).
Please estimate the number of Monterey pines that would be cut down and killed.

Natural forests of mature Monterey Pine contain about 200 to 400 trees

per acre. This comes to about 1 million pounds of Monterey Pine biomass per acre.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Native Monterey Pine Biomass.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 740 - MONTEREY PINE BIOMASS PROTECTION.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Monterey Pine Biomass Protection.

* 741 - MONTEREY PINE NATIVE FOREST LOSS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Monterey Pine Native Forest Loss.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

We do not know the natural cycle of population variability of native Monterey Pine Forest, but we do know its decline is directly caused by human destruction - and there is no end in sight for that.

"A 1981 study estimated that for each hectare of US Wetlands destroyed by development, the lost ability to soak up floodwaters increased annual flood damages by \$3300 to \$11,000." Forests provided ecological services on the order of \$300 per hectare per year. Wade Roush, Science May 16 1997 pg 1029

By allowing induced growth due to the Dam, this species could be threatened by increased development.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on

Monterey Pine Native Forest Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 742 - MONTEREY PINE NATIVE FOREST LOSS HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Monterey Pine Native Forest Loss Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Monterey Pine Native Forest Loss Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 743 - NATIVE MONTEREY PINE GENETIC RESOURCE LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Native Monterey Pine Genetic Resource Loss.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

The Draft EIR for Pebble Beach Lot Program pg 3 states "Many of the impacts address the loss of up to 57,000 trees, and the resultant loss of wildlife habitat and ENDANGERMENT TO THE MONTEREY PINE SPECIES ITSELF."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Native Monterey Pine Genetic Resource Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 744 - MONTEREY PINE FOREST ECOLOGICAL SERVICES LOSS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on
Monterey Pine Forest Ecological Services Loss.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

Fog drip provides as much as 45 percent of a redwood's annual water use.
Some understory plants depend completely on fog drip. In a 3 year study,
in an intact redwood forest 34 percent of the hydrologic input per year
came from fog drip. After logging the fog drip contribution dropped to 17
percent. Oecologica, January 1999, Todd Dawson, Cornell University
Monterey pine is also highly dependent on fog drip. Its inland boundary
is defined as the extent of the fog line.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance on
Monterey Pine Forest Ecological Services Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

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* 745 - MONTEREY PINE (P. RADIATA) NATIVE FOREST ECOSYSTEM LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Monterey Pine (P. radiata) Native Forest Ecosystem loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Pinus Radiata (Monterey Pine) is a "Federal Species of Concern", and was listed as an Endangered species by the United Nations - Food and Agricultural Organization in 1986. Monterey County considers the tree species a "Sensitive Resource" when they list it first and ahead of the live Oak in the Slide show presentation which is now on their Web Site.

Monterey County contains the largest healthy forests of Monterey pine (pinus Radiata). It lies directly in the center of the natural range of the tree. The tree grows up to a few miles inland from the coast.

The Draft EIR for Pebble Beach Lot Program pg 3 states "Many of the impacts address the loss of up to 57,000 trees, and the resultant loss of wildlife habitat and ENDANGERMENT TO THE MONTEREY PINE SPECIES ITSELF."

32 acres of Monterey pine forest loss is "Substantial"

The California Coastal Commission wrote -
"The approximately 9 acres of native Monterey pine forest to be cleared for the [Spanish Bay] golf course represents a substantial long-term impact." - Spanish Bay Project Final approval 1984 pg 25.

SUBSTANTIAL ... LONG-TERM impact...

"a substantial area of Monterey pine forest is proposed for removal."
- Spanish Bay Project Final approval 1984 pg 23.

This last sentence referred to 32 acres of forest.

Animals supported by the Monterey pine forest include the Ringtail (Bassariscus astutus) - a fully protected species, Striped and spotted Skunk, Bobcat, Black Bear, Mountain Lion, Gray fox, Coyote, long-tailed Weasel, Badger, Merriam's Chipmunk, California Ground Squirrel and Western Gray Squirrel, Deer mouse, California mouse, Brush mouse, Pinion mouse California Vole, Dusky-footed wood-rat, Black-tailed Rabbit, Brush Rabbit, Desert Cottontail Mule deer, Botta's pocket gopher, Raccoon, Western Mastiff bat, Pallid Bat, Hoary bat, Big Brown Bat, Red Bat, California Myotis, Yuma Myotis, long-eared Myotis, long-legged Myotis, Small-footed Myotis, Ornate Shrew, Trowbridge's Shrew, shrew-Mole, Broad-footed Mole and Opossums.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Monterey Pine (P. radiata) Native Forest Ecosystem loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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46. Please provide the reverse of this impact as Mitigation.

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* 746 - PRESCRIBED BURNING OF NATIVE MONTEREY PINE FOREST.

Prescribed Burning is often claimed as necessary to mimic natural

forest processes.

If this were valid case why stop at burning, we should be recreating volcanic eruptions as well.

MOST NATURAL FIRES "FIZZLE OUT"

"Scientists have learned that almost all lightning-induced fires simply fizzle out before burning even a single hectare of land." Environmental Science (textbook) ; Morgan, Moran & Weirsma; W.C. Brown, 1993, pp 206

What is the Environmental damage to Endangered Species from the smoke?

QUANTIFICATION OF BENEFITS

There is little or no factual evidence in the document showing how this benefit can be achieved.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this benefit's value.

A1. If no objective criteria are used please state that clearly.

B. Please state the name of the measurement units (numbers) used to determine the value for EACH criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in PERCENT, to which the benefit would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in ABSOLUTE AMOUNT, to which this benefit would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a benefit to a less-than-significant benefit and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this benefit is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. BENEFIT VALUE PROOF

Please cite and provide relevant studies that clearly show that this purpose could be achieved.

J1. Please discuss the limitations of those studies.

J2. Please clearly describe the maximum amount of benefit achieved in the studies.

K. BENEFIT DURATION

Please clearly describe the maximum length of time the purposes were achieved in the studies.

K1. Please graph the benefit achieved versus time in the studies. It is important to know how long the benefit lasts with some degree of certainty.

K2. Please graph the expected achieved versus time for this project.

L. COSTS

It is important to know the cost to benefit ratio. Please cite the total costs for the projects studied.

M. Please name each expert who prepared and reviewed this benefit analysis.

M1. Please cite each expert's training, competence and experience specific to this benefit analysis.

N. Please state to which criteria the Benefit predictions are most sensitive?

* 747 - PRESCRIBED BURNING OF NATIVE MONTEREY PINE FOREST.

There is absolutely ZERO evidence that fire is required for the health of, or common in, a native or natural Monterey pine forest.

It is sometimes asserted that Monterey pine forests depend on frequent fire to maintain health and that fire in radiata forests has been unnaturally suppressed. An examination of the cited and available sources showed no real evidence for such a conclusion.

Jones & Stokes (1994 Ecological Assessment and 1996 Conservation

Strategy Report) argues that fire has been suppressed in natural radiata forests. They then try to make a case for managing radiata forests using artificially induced fire. They state "we can speculate that [Monterey pine] evolved under a fire regime in which fire returned to any given patch of forest at intervals of less than 150 years." For evidence they cite "Greenlee and Langenheim 1990."

It is difficult to determine how they reached such a conclusion since the Greenlee and Langenheim 1990 paper does not mention -
 1) Monterey pine
 2) Monterey pine forest
 3) or even the Monterey Peninsula which contains the largest, healthiest and most important remaining natural Monterey pine forests.

On the other hand a credible source is the well researched "Monterey Bay Area: Natural History and Cultural Imprints" by Burton L. Gordon 1974, 1996 Boxwood Press. Gordon takes a more scientific assessment writing "Having searched written records covering some 125 years (and consulted local park rangers and city fire departments), the writer concludes that it is impossible to extrapolate a credible natural burn cycle of less than 500 years for the coastal half of the Monterey Bay area and for the inland half, less than 300 years."

WORLD'S LEAST OCCURENCE OF THUNDERSTORMS AND LIGHTNING
 The available evidence indicates Monterey pine habitat which is located in three tiny low altitude coastal areas with some of the world's lowest frequency of lightning (the only common cause of natural fires) (Scientific American August 1997 pg 52) thunderstorms. Many other key factors indicate a very low potential of frequent natural fire in native Monterey pine habitat.

Monterey Pine Forests at Low Elevation, Lightning at High Elevation -
 Monterey pine forest rarely grows naturally above 1000 feet (300 meters) in altitude or inland of the wet summer fog belt. While lightning strikes can occur at sea level in Monterey pine forest it is extremely rare.

In contrast, lightning strikes along the central coast occur mainly at high elevations, as unstable ocean air is forced over the dramatic mountains (called Orographic lifting) of Big Sur which often exceed 4000 feet (1200 meters). The higher the hill, the more frequent the lightning strikes. The lower the hill, the less frequent the lightning strikes.

A USFS study of 100,000 fires in California in the 1970's under jurisdiction of CDF and USFS (Keeley 1981) found less than one percent of lightning caused fires occurred below 250 meters (800 feet) in elevation.

Central California coast lightning at or near sea level is almost

unknown. According to "Physical Geography" 1990 by Tom Knight coastal central California has the lowest frequency of thunderstorms in the conterminous United States at less than 5 per year. Lightning requires thunderstorms. Lightning does not occur during the wet summer fog in Monterey pine habitat. When lightning does occur, it is almost always during a wet cold front. The rain accompanying the cold front makes the forest less flammable. "Undoubtedly, many of these fires would not spread very far even if they were not suppressed." (Keeley citing Snow & Kotok 1923)

This mirrors my research in 1995 where CDF (in King City and Monterey) asserted there were no reported fires in Monterey pine forest since 1959. I also interviewed former Sid Ormsbee fire lookout Beth Reddish who said she could not recall a single fire in Monterey pine forest in the decades she and her husband worked that Carmel Valley fire lookout.

"Distribution of Lightning and Man Caused Wildfires in California", Jon E. Keeley, Asst Prof of Biology, Occidental College, Los Angeles; General Technical Report. PSW-58. Berkeley, CA: Pacific SW Forest and Range Experiment Station, USFS, USDoA; 1982.

MOST NATURAL FIRES "FIZZLE OUT"
 "Scientists have learned that almost all lightning-induced fires simply fizzle out before burning even a single hectare of land." Environmental Science (textbook) ; Morgan, Moran & Weirsma; W.C. Brown, 1993, pp 206

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
 Prescribed Burning of Native Monterey Pine Forest.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
 Prescribed Burning of Native Monterey Pine Forest. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
 Prescribed Burning of Native Monterey Pine Forest. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Prescribed Burning of Native Monterey Pine Forest.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
 Prescribed Burning of Native Monterey Pine Forest.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
 Prescribed Burning of Native Monterey Pine Forest.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 748 - MONTEREY PINE NATIVE FOREST SCENT.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Monterey Pine Native Forest Scent.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Sam Minturn Executive Director of the California Christmas Tree Association "thinks Monterey Pines make great christmas trees. They are full and bushy, he said 'and their fragrance is outstanding.'"; and
"Chong Kang, owner of Lighthouse Produce in Pacific Grove said [those who ask for Monterey pine christmas trees] have previously cut the trees themselves and know they smell good." Herald Dec 3 1999 front page

The Monterey Pine Forest Scent is distinct from other forests and changes depending on the weather and season.

The scent can be distinguished from that of a redwood forest or the nearby Monterey Cypress forest.

In summer they have the scent of dry pine needles plus the elusive scent aroma of Yerba Buena, a mint. Not surprisingly the winter brings a mustier wet fragrance.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Monterey Pine Native Forest Scent.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 749 - NATIVE MONTEREY PINE FOREST MILLION-YEAR-OLD-SOIL LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Native Monterey Pine Forest Million-Year-Old-Soil Loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Soil experts agree that the soils under the native Monterey pine on the

Monterey Peninsula are at least 750,000 years old and more likely one million years old.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on
Native Monterey Pine Forest Million-Year-Old-Soil Loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 750 - PRUNING PINUS RADIATA (MONTEREY PINE) ROOTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Pruning Pinus Radiata (Monterey Pine) Roots.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

According to Carmel City Forester Gary Kelley "Mature Monterey pines do not tolerate root pruning." Carmel Pine Cone, front page June 12 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Pruning Pinus Radiata (Monterey Pine) Roots.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 751 - MONTEREY CYPRESS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Monterey Cypress.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Under natural conditions the Monterey Cypress verged on extinction.

When Europeans first arrived there were fewer than 11,000 of these trees, growing within a total area of some 50 acres, and all within several hundred meters of shoreline on the Monterey Peninsula and around Carmel Bay (Greene, 1929, p 197)." -Burton Gordon, Monterey Bay Area: Natural History and Cultural Imprints, 1996, Boxwood Press

The Monterey Cypress has one of the most restricted natural ranges of any California tree. The only natural stands of Monterey Cypress occur in the Point Lobos Reserve and along the coast between Pescadero Point and Point Cypress in Monterey County.

The Monterey Cypress is resistant to moisture high in salinity and high winds, enabling it to successfully compete with Monterey pines, the regional climax community along the Monterey coastline.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Monterey Cypress.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 752 - MONTEREY CYPRESS HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Monterey Cypress Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Monterey Cypress Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 753 - BISHOP PINE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the project's potential impacts on Bishop Pine.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Bishop pine (pinus) occurs in Monterey County at Huckelberry Hill in Pebble Beach.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Bishop Pine.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 754 - LOSS AND HARM TO MYCORRHIZE FUNGI.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on Loss and Harm to Mycorrhize Fungi.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

There are 527 species of fungi closely associated with old-growth and mature forests in the Northwest US and 150 species of slugs and terrestrial snails. "The Status and Trends of Our Nation's Biological Resources" by USGS

Mycorrhize Fungi are a furry brown layer of millions of protective filaments which coat most tree roots (including Redwood, Monterey pine) and secrete antibiotics and stabilize the soil. Sierra Sept 1999 pg 22

Mycorrhize Fungi increase the uptake of phosphorus and nitrogen in trees, particularly in soils with low concentrations of P & N. -Fungi, Carlisle, Watkinson, Academic Press, 1994-1997

Most fungi, including mycorrhize, are harmed by oxygen deprivation, low water activity, low temperatures, heat, ionizing radiation and sulphur. -Fungi, Carlisle, Watkinson, Academic Press, 1994-1997

Mycorrhize Fungi are highly sensitive, easily harmed, by soil compaction. David Adams, California Department of Forestry Pathologist Personal Communication, May 31, 2000

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Loss and Harm to Mycorrhize Fungi.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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-

* 755 - LOSS AND HARM TO LICHENS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the project's potential impacts on
Loss and Harm to Lichens.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Lichens absorb substances from rainwater and are particularly susceptible to airborne toxic compounds. Thus the presence or absence of lichens is a sensitive indicator of air pollution."
-Biology (textbook 1984), H. Curtis pg 450

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Loss and Harm to Lichens.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 756 - INADEQUATE GENERAL PLAN.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Inadequate General Plan.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

This General Plan fails to provide any quantitative limits to growth. No
No recognition of the very real limits to water, traffic capacity, electrical supply, sewage disposal, and parking we must endure.

It is not long term in perspective. (Gov Code 65300)

Inconsistent with state policy on housing, open space, forest and timber resources, timberland preserve zone and environmental quality.

Failure to include standards of population density and building intensity.

No Connection between stated density to any of the classified types of areas and the tabulated land use categories, making it impossible to relate any tabulated density standard of population to any location in the county.

Circulation and Land Use Elements are neither correlated or internally consistent.

Does not identify areas subject to flooding.

Does not map all known seismic and other geologic hazards (known landslide areas re: 1995-1998 floods).

It does not spell out allowable uses for each land use district.

The density ranges are not specific to provide guidelines in making consistency findings for zoning, use permits, events and subdivisions.

Inclusion of a precedence clause. No Element of a General Plan can take precedence over another. This is facial evidence of an internal inconsistency.

Failure to quantify natural resources and their limits of sustainable use.
Erosion of natural resource values by cumulative projects needs to be compared to something objective.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Inadequate General Plan.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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* 757 - GENERAL PLAN INCONSISTENCY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
General Plan InConsistency.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Monterey County prohibits ridgeline development. Yet Monterey County has approved ridgeline development at Carmel Valley Ranch and Canada Woods North.

The General Plan's Resource Conservation Element conflicts with its Land Use Element in that if the Land Use element is followed, the Resource Conservation Element is violated.

The County Local Coastal Plan (recommending widening Highway 1 to 4 lanes) conflicts with the Coastal Act sec. 30254 which says "it is the intent of the Legislature that State Highway Route 1 in rural areas of the coastal zone remain a scenic two-lane road." This conflict is so significant Cal-Trans wrote the Coastal Commission asking for it to be interpreted away. Cal-Trans letter June 12, 2000 to Tami Grove from Wendy Waldron of Cal-Trans SLO

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of General Plan InConsistency.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.	38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.	(non-subjective) criteria used to determine this Alternative's benefits.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.	39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.	A1. If no objective criteria are used please state that clearly.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.	40. Please state whether the margin of error is measured or assumed.	A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.	41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.	B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.
20a. Please state whether this MARGIN of ERROR is measured or assumed.	42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.	B1. If no measurement units are used please state that clearly.
20b. If no margin of error is used please state that clearly.	43. Please name each EXPERT who prepared and reviewed this impact.	C. Please state the method of measurement used to determine the value for each criteria.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.	44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.	C1. If no measurement units are used please state that clearly for each criteria.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.	45. Please provide AVOIDANCE MITIGATION for this impact.	C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	46. Please provide the reverse of this impact as Mitigation.	D. Please state the existing or current baseline measurement (level) for each criteria.
24. Please state whether the MARGIN of ERROR is measured or assumed.	47. Please provide an ALTERNATIVE which avoids this impact.	E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.	48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.	E1. If an average is used, please state which kind of average.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	-	E2. Please state the extreme conditions which will be encountered.
27. Please state whether the MARGIN of ERROR is measured or assumed.	* 758 - GENERAL PLAN WITH A COLOR-BLIND POPULATION LIMIT. The Document appears to have ignored this potentially feasible Alternative. Please carefully analyze and disclose the potential benefits of General Plan with a Color-Blind Population Limit.	F. Please provide a graph of historical measurement.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.	No one wants our Peninsula or our County to look like San Jose or Tokyo. But we can't avoid SanJosification - if we don't stop growing at some point. If we don't stop, no matter how slow (or "sustainably") you grow, someday our whole Peninsula will be paved over just like San Jose. Remember San Jose used to be covered in trees like our Peninsula is - so far.	G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.
29. Please list all potential CUMULATIVE impacts related to this one.	So we are all agreed we must stop at some point.	H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.
30. Please describe all potential CUMULATIVE impacts related to this one.	We disagree strongly about when to stop.	H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.
31. Please quantify all potential CUMULATIVE impacts related to this one.	Whatever that limit, or cap is one must be set to adequately measure and limit the cumulative significant environmental impacts from population growth.	H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;
32. Please list, describe and quantify all potential compound and synergetic impacts.	So create a numeric limit for population and make it color-blind as an alternative.	H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.
33. Please list, describe and quantify all Construction impacts related to this one.	ALTERNATIVE FACTUAL ANALYSIS	I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.
34. Please list, describe and quantify all Growth impacts related to this one.	There is little or no factual evidence in the document showing why this alternative is infeasible.	I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.
35. Please list, describe and quantify all Indirect impacts related to this one.	A. Please clearly identify by name and describe each of the objective	

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 759 - INADEQUATE WATER RIGHTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Inadequate Water Rights.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

There is no evidence or finding that adequate legal water rights exist.

Two thirds of every gallon of water pumped from the Carmel River is illegal water.

The water rights could have been severed or subordinated. Legal water rights are wholly independent from water supply quantity and water quality. You can have adequate water supply quantity and quality without having any right to the water.

Monterey County Dept of Environmental Health does not determine whether adequate water rights exist.

Monterey County Water Resources Agency does not determine whether adequate water rights exist.

Monterey County Counsel's office does not determine whether adequate water rights exist.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Inadequate Water Rights.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 760 - HOUSING.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Housing.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Please state the number of existing Lots of Record. Please state what document, facts and what approval that is based on.

Lack of programs to conserve stock of affordable housing.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Housing.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 761 - INADEQUATE OR OUT OF DATE GENERAL PLAN NOISE ELEMENT.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Inadequate or Out of Date General Plan Noise Element.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Please include a map of areas of silence; lands where the sounds of human activities are not heard, or are only rarely heard. Use "topographic lines" to indicate 40 dBA, 35 dBA, 30 dBA, 25 dBA etc.

Noise exposure information is not included. Community noise exposure inventory is not included. There is no quantitative inventory of noise levels. There is no statement of policy to avoid excessive noise.

There is no map of expected future noise growth in area and volume.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Inadequate or Out of Date General Plan Noise Element.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 762 - INADEQUATE OR OUT OF DATE GENERAL PLAN OPEN SPACE ELEMENT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Inadequate or Out of Date General Plan Open Space Element.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

California Gov Code Section 65560. (b) "Open-space land" is any parcel or area of land or water which is ESSENTIALLY UNIMPROVED and devoted to an open-space use...

There is No Open Space Inventory or Map. Please prepare both.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Inadequate or Out of Date General Plan Open Space Element.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.	28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.	this impact please explicitly state the page number and paragraph.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.	29. Please list all potential CUMULATIVE impacts related to this one.	The Monterey Bay National Marine Sanctuary was created since the General Plan was adopted and it makes no mention of the Sanctuary.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.	30 Please describe all potential CUMULATIVE impacts related to this one.	Many wildlife species have been formally listed under the Federal and State Endangered Species acts since the General Plan was approved. Although the General Plan has been amended regularly to allow development, none of the newly listed species or their habitat have been acknowledged. The General Plan is out of date because it does not recognize the potential impacts to those species, their thousands of acres of habitat and the protection they need.
9. Please state the variance's MARGINS of ERROR or confidence level.	31. Please quantify all potential CUMULATIVE impacts related to this one.	Just a few of the species listed since the General Plan was adopted include: West Coast Steelhead (<i>Oncorhynchus mykiss</i> , or <i>O. mykiss</i>) 1997, the California Red-Legged Frog (<i>Rana aurora draytonii</i>) 1996, the Snowy plover, Gowen Cypress, Yadon's Piperia, Condors have been reintroduced, Marbled Murrelets have been found nesting, Northern Spotted Owls, Great gray owl, Elf Owls, Smith's Blue Butterfly.
10. Please state whether this MARGIN of ERROR is measured or assumed.	32. Please list, describe and quantify all potential compound and synergetic impacts.	The California Red-Legged Frog and the West Coast Steelhead (<i>Oncorhynchus mykiss</i>) are both significantly harmed by overpumping of the Carmel River causing its dewatering. The US-Fish & Wildlife Service (FWS) has warned that dewatering the Carmel River is potentially a take of the Frog (CRLF) under the Endangered Species Act. The US-National Marine Fisheries Service has concluded "steelhead are continuing to be taken every year due to the overpumping."
11. If an average is used, please state which kind of average.	33. Please list, describe and quantify all Construction impacts related to this one.	Pinus Radiata (Monterey pine) was listed by the United Nations FAO in 1986 as an Endangered tree; after that the species and its habitat became threatened dramatically threatened by Pine Pitch Canker (<i>Fusarium subglutinans</i>). At the same time the Pebble Beach Company proposes to destroy hundreds of acres (more than a square mile) of the healthiest native Pinus Radiata forest remaining. The General Plan does not acknowledge this or provide any protection for the tree or its habitat - in fact the County takes pains to avoid any protection for the tree.
12. Please state the most extreme values which could be encountered.	34. Please list, describe and quantify all Growth impacts related to this one.	Five (5) plants are newly listed under the Endangered Species Act in 1999, three more plants were listed in Marc 2000.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.	35. Please list, describe and quantify all Indirect impacts related to this one.	There is No Open Space Inventory or Map. Please prepare both.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.	36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.	Conservation Easements have been lifted by the County with abandon. Canada Woods East is now a housing development, when it was willed to the Big Sur Land Trust to be kept in a permanent conservation easement.
15. Please provide a graph of HISTORICAL measurements.	37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.	
16. Please quantify the length of time this impact would last.	38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.	
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.	39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.	
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.	40. Please state whether the margin of error is measured or assumed.	
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.	41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.	
20a. Please state whether this MARGIN of ERROR is measured or assumed.	42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.	
20b. If no margin of error is used please state that clearly.	43. Please name each EXPERT who prepared and reviewed this impact.	
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.	44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.	
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.	45. Please provide AVOIDANCE MITIGATION for this impact.	
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	46. Please provide the reverse of this impact as Mitigation.	
24. Please state whether the MARGIN of ERROR is measured or assumed.	47. Please provide an ALTERNATIVE which avoids this impact.	
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.	48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.	
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	-	
27. Please state whether the MARGIN of ERROR is measured or assumed.	* 763 - INADEQUATE OR OUT OF DATE GENERAL PLAN CONSERVATION ELEMENT. The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Inadequate or Out of Date General Plan Conservation Element. If you claim the document contains proof of no-significant-impact for	

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Inadequate or Out of Date General Plan Conservation Element.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 764 - PERMANENT WILDLAND LAND USE CATEGORY.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of Permanent Wildland Land Use Category.

The use of Permanent Wildland Land Use Category would allow lands to be placed in this designation and not changed for development unless approved by a public vote.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 765 - INADEQUATE OR OUT OF DATE GENERAL PLAN CIRCULATION ELEMENT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of

Inadequate or Out of Date General Plan Circulation Element.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Inadequate or Out of Date General Plan Circulation Element.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
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- * 766 - LOCAL LAND USE PLAN IN-CONSISTENCY.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Local Land Use Plan In-Consistency.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Local Land Use Plan In-Consistency.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
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12. Please state the most extreme values which could be encountered.
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15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
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32. Please list, describe and quantify all potential compound and synergistic impacts.
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43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
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46. Please provide the reverse of this impact as Mitigation.
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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 767 - CONFLICT WITH EXISTING OPEN SPACE LAND USE.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Conflict with Existing Open Space Land Use.
- If you claim the document contains proof of no-significant-impact for

this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Conflict with Existing Open Space Land Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

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18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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24. Please state whether the MARGIN of ERROR is measured or assumed.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 768 - CONFLICT WITH EXISTING CONSERVATION LAND USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Conflict with Existing Conservation Land Use.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Conflict with Existing Conservation Land Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

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* 769 - CONFLICT WITH EXISTING AGRICULTURAL LAND USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Conflict with Existing Agricultural Land Use.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Schools downwind of, adjacent to, or near agricultural lands where
pesticides are used are a conflict of land uses.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Conflict with Existing Agricultural Land Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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-

* 770 - CONFLICT WITH EXISTING RESIDENTIAL LAND USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Conflict with Existing Residential Land Use.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Any increase in pesticide use near residential areas is a land use
conflict.

Please require full pesticide use disclosure to all residents at least
two (2) months prior to any pesticide application.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Conflict with Existing Residential Land Use.

1b. If no objective criteria are used please state that clearly.

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47. Please provide an ALTERNATIVE which avoids this impact.

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* 771 - INCOMPATIBILITY WITH COUNTY GROWTH MANAGEMENT POLICY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Incompatibility with County Growth Management Policy.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Incompatibility with County Growth Management Policy.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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* 772 - COASTAL ACT IN-CONSISTENCY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Coastal Act In-Consistency.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Wetlands, estuaries, streams, riparian habitats, lakes and portions of open coastal waters" in the Coastal Zone are Environmentally Sensitive Habitat Area (ESHA) according to California Coastal Commission
"Statewide Interpretive Guideline for Wetlands and other Wet Environmentally Sensitive Habitat Areas (adopted 2/4/81)" and cannot be altered or destroyed unless the project is dependent on the resources.

The Coastal Act definition of wetlands would include the wetland areas of Estuarine, Palustrine, and Lacustrine ecological systems defined by the US-Fish & Wildlife Service classification system.

Habitat for listed plant species is ESHA and can not be altered or destroyed unless the project is dependent on the resources.

Habitat for listed animal species is ESHA and can not be altered or destroyed unless the project is dependent on the resources.

For all listed species potential habitat and wetlands this project could affect - please explain how this project is dependent on each of the natural resources it would diminish.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Coastal Act In-Consistency.

1b. If no objective criteria are used please state that clearly.

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3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 773 - INADEQUATE OR OUT OF DATE COASTAL PLAN.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Inadequate or Out of date Coastal Plan.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Since the Coastal Plan was adopted many significant environmental circumstances have changed for the worse.

WATER:

LUP states "there will be some increase in water supply."; yet, water supply has decreased.
Water supply for the Monterey Peninsula area became legally constrained with (SWRCB order 95-10).

Carmel River Dam approval voided by the court.
Saltwater Intrusion has Increased in the Salinas River Aquifer.

TRAFFIC:

LOS "F" on Hwy 1 @ CVR
LOS "F" on Hwy 1 @ Hwy 68
LOS "F" on Hwy 68 to PG
LUP states HCF "will be constructed";
HCF approval was voided by court in 1998

BIOTA:

LUP states "there will be no major change in environmental regulations";
yet The Monterey Bay National Marine Sanctuary was created since the General Plan was adopted and it makes no mention of the Sanctuary.

Many wildlife species have been formally listed under the Federal and State Endangered Species acts since the General Plan was approved.
Although the General Plan has been amended regularly to allow development, none of the newly listed species or their habitat have been acknowledged. The General Plan is out of date because it does not recognize the potential impacts to those species, their thousands of acres of habitat and the protection they need.

Just a few of the species listed since the General Plan was adopted include: West Coast Steelhead (*Oncorhynchus mykiss*, or O. mykiss) 1997, the California Red-Legged Frog (*Rana aurora draytonii*) 1996, the Snowy plover, Gowen Cypress, Yaden's Piperia, Condors have been reintroduced, Marbled Murrelets have been found nesting, Northern Spotted Owls, Great gray owl, Elf Owls, Smith's Blue Butterfly.

The California Red-Legged Frog and the West Coast Steelhead (*Oncorhynchus mykiss*) are both significantly harmed by overpumping of the Carmel River causing its dewatering. The US-Fish & Wildlife Service (FWS) has warned that dewatering the Carmel River is potentially a take of the Frog (CRLF) under the Endangered Species Act. The US-National Marine Fisheries Service has concluded "steelhead are continuing to be taken every year due to the overpumping."

Pinus Radiata (Monterey pine) was listed by the United Nations FAO in 1986 as an Endangered tree; after that the species and its habitat became threatened dramatically threatened by Pine Pitch Canker (*Fusarium*

subglutinans). At the same time the Pebble Beach Company proposes to destroy hundreds of acres (more than a square mile) of the healthiest native *Pinus Radiata* forest remaining. The General Plan does not acknowledge this or provide any protection for the tree or its habitat - in fact the County takes pains to avoid any protection for the tree.

Five (5) plants are newly listed under the Endangered Species Act.

The Bolsa Chica case has increased Coastal Zone protection for ESHA.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

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1b. If no objective criteria are used please state that clearly.

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*** 774 - INADEQUATE OR OUT OF DATE COASTAL PROGRAM.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Inadequate or Out of Date Coastal Program.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"The [Coastal] Commission observed that an update of the Del Monte Forest Area LCP segment probably is warranted." Sept 9, 1998 letter from Coastal Commission to Monterey County Board of Supervisors
The Bolsa Chica case has increased Coastal Zone protection for ESHA.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 775 - INCOMPATIBLE LAND USES.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Incompatible Land Uses.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Incompatible Land Uses.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 776 - LOW INCOME HOUSING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Low Income Housing.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

California Gov Code Section 65590 requires that housing units in the coastal zone for low- and moderate-income residents be provided whenever possible, be protected where they currently exist, and be replaced when demolished.

There is a large demand for, and large shortage of, Low Income Housing throughout Monterey County as of 2004.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Low Income Housing.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.	26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	If you do not adopt this mitigation measure, please explain fully why it is not feasible.
5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.	27. Please state whether the MARGIN of ERROR is measured or assumed.	Please carefully analyze and disclose the potential benefits of Low-Income Housing Deed Restriction.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.	28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.	To provide permanent low-cost housing Monterey County can buy housing, put a permanent deed restriction on the property and sell it on the open market. The difference in the price the city pays and the cost they sell the land at is the cost of the program. In inflationary times the city may even realize a profit from this program. It is vital to put a reversionary clause in so that if anyone tries to remove a deed restriction that land reverts back to a responsible party (e.g. Park District, No-profit housing agency, District Attorney's office) who will enforce such a deed restriction.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.	29. Please list all potential CUMULATIVE impacts related to this one.	-
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.	30. Please describe all potential CUMULATIVE impacts related to this one.	* 778 - AUXILIARY HOUSING.
9. Please state the variance's MARGINS of ERROR or confidence level.	31. Please quantify all potential CUMULATIVE impacts related to this one.	The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Auxiliary Housing.
10. Please state whether this MARGIN of ERROR is measured or assumed.	32. Please list, describe and quantify all potential compound and synergetic impacts.	If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
11. If an average is used, please state which kind of average.	33. Please list, describe and quantify all Construction impacts related to this one.	Please state the maximum number and maximum total square footage of all auxiliary housing units and other buildings which could potentially be built if this application is approved. (i.e. Granny Unit, Caretaker's unit, Guest house)
12. Please state the most extreme values which could be encountered.	34. Please list, describe and quantify all Growth impacts related to this one.	QUANTIFICATION OF BASELINES AND IMPACTS:
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.	35. Please list, describe and quantify all Indirect impacts related to this one.	This impact appears to be potentially significant.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.	36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.	1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Auxiliary Housing.
15. Please provide a graph of HISTORICAL measurements.	37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.	1b. If no objective criteria are used please state that clearly.
16. Please quantify the length of time this impact would last.	38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.	2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.	39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.	3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.	40. Please state whether the margin of error is measured or assumed.	3b. Please quote the definition used.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.	41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.	4. If no measurement units are used please state that clearly.
20a. Please state whether this MARGIN of ERROR is measured or assumed.	42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.	5a. Please state the METHOD of measurement used to determine the significance for each criteria.
20b. If no margin of error is used please state that clearly.	43. Please name each EXPERT who prepared and reviewed this impact.	5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.	44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.	
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.	45. Please provide AVOIDANCE MITIGATION for this impact.	
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	46. Please provide the reverse of this impact as Mitigation.	
24. Please state whether the MARGIN of ERROR is measured or assumed.	47. Please provide an ALTERNATIVE which avoids this impact.	
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.	48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.	
	* 777 - LOW-INCOME HOUSING DEED RESTRICTION.	
	The Document appears to have ignored this potentially feasible Mitigation.	

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 779 - CONFLICTS WITH PROTECTIVE ORDINANCES AND POLICIES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of

Conflicts with Protective Ordinances and Policies.

If you claim the document contains proof of no-significant-impact for

this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Conflicts with Protective Ordinances and Policies.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 780 - CONFLICTS WITH HABITAT CONSERVATION PLANS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Conflicts with Habitat Conservation Plans.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Conflicts with Habitat Conservation Plans.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 781 - OUT OF COUNTY HOUSING DEMAND INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Out of County Housing Demand Increase.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

When additional jobs are created in Monterey County (that cannot be wholly served by Monterey County residents) without a similar increase in affordable housing it causes an Increase in housing demand in counties outside Monterey County.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Out of County Housing Demand Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 782 - OUT OF COUNTY TRAFFIC INCREASE.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of

Out of County Traffic Increase.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

When additional jobs are created in Monterey County (that cannot be wholly served by Monterey County residents) without a similar increase in affordable housing it causes an Increase in housing demand in counties outside Monterey County.
This increase in housing demand in counties outside Monterey County causes an increase in commuting traffic outside Monterey County.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Out of County Traffic Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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43. Please name each EXPERT who prepared and reviewed this impact.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 783 - OUT OF COUNTY WATER DEMAND INCREASE.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Out of County Water Demand Increase.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

When additional jobs are created in Monterey County (that cannot be wholly served by Monterey County residents) without a similar increase in affordable housing it causes an Increase in housing demand in counties

outside Monterey County.
This increase in housing demand in counties outside Monterey County causes an increase in water supply demand outside Monterey County.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Out of County Water Demand Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 784 - OUT OF COUNTY SEWERAGE DEMAND INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Out of County Sewerage Demand Increase.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

When additional jobs are created in Monterey County (that cannot be wholly served by Monterey County residents) without a similar increase in affordable housing it causes an Increase in housing demand in counties outside Monterey County.
This increase in housing demand in counties outside Monterey County causes an increase in Sewerage needs outside Monterey County.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Out of County Sewerage Demand Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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12. Please state the most extreme values which could be encountered.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 785 - REGIONAL TRANSPORTATION PLAN POLICIES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Regional Transportation Plan Policies.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Please explain how this project is consistent with the Regional Transportation Plan

Policy 1.1.2

"Public Transit, ridesharing, carpooling, bicycle and pedestrian access, park and ride facilities, and other transportation demand management strategies SHALL be pursued as preferred alternatives over transportation construction projects where feasible."

Policy 1.1.3

"Pedestrian and Bicycle access, and transit access shall be incorporated into the design of new residential and commercial developments by amending development standards, zoning ordinances, and applicable subdivision ordinances."

Policy 1.2.3

"Three strategies should be employed ...
3) reconsideration of land use plans and project size to alleviate further congestion and degradation in LOS."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Regional Transportation Plan Policies.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

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5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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 13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
 14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
 15. Please provide a graph of HISTORICAL measurements.
 16. Please quantify the length of time this impact would last.
 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
 18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
 19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
 - 20a. Please state whether this MARGIN of ERROR is measured or assumed.
 - 20b. If no margin of error is used please state that clearly.
 21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
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 23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
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 36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
 37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
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 39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
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 44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
 45. Please provide AVOIDANCE MITIGATION for this impact.
 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
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- * 786 - PEDESTRIAN ACTIVITY.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Pedestrian Activity.
- If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
- Pedestrian Activity is discouraged by noise (Southworth 1967) and vehicle speeds increasing accident hazards.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pedestrian Activity.
 - 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
 - 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
 - 3b. Please quote the definition used.
 4. If no measurement units are used please state that clearly.
 - 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
 - 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
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 8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
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* 787 - OVERPUMPING A WATER SUPPLY SYSTEM.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Overpumping a Water Supply System.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

A clear measure that a watershed or a water supply system is at or over capacity is the presence of a waiting list for those wanting water. In the Monterey Peninsula area Pacific Grove, Carmel, Seaside, Monterey and Monterey County all require those wanting water to sign up on a water waiting list.

Water Tables around the world are falling at an average rate of three meters (9.8 feet) a year. The Earth's annual water deficit is at 160 billion cubic meters.
-Worldwatch book: Pillar of Sand: Can the Irrigation Miracle last?

CALIFORNIA HAS STAGGERING WATER SHORTAGES - NOW!
The California Water Plan (Bulletin 160-98 pg 1-2) states that California used 78 million acre feet of water in 1995.

CALIFORNIA USES 5 TIMES AS MUCH WATER AS IT GOT IN 1977
Comparing that figure with the 1977 statewide runoff total of only 15 million acre feet of water (pg 3-6 Bulletin 160-98. This means we needed and used five times (5) as much water in 1995 as the state physically received in runoff in 1977. We used Five Times more water than we get!

This means that taking water from some other area of California is a cumulative impact on the total water of the state.

MONTEREY COUNTY IN WATER CRISIS - NOW!

MONTEREY COUNTY HAS A DESERT CLIMATE
The Salinas Valley was designated on early maps as the "Salinas Desert."
The Monterey Peninsula is not in a rainforest, nor is it in the American Midwest or Deep South where rain often occurs daily - Our Monterey Peninsula is in a semi-DESERT climate. Data collected by the National Weather Service over the past 39 years show that Carmel Valley, the primary water source for the Peninsula, only gets an average of 18 inches of rain a year.

According to Monterey County Water Resources Agency, the Salinas River groundwater basin is overpumped by some 40,000 to 50,000 acre feet more

per year than is replaced by groundwater recharge.

This means that taking water from some other area of Monterey County is a cumulative impact on the total water of the County.

TWO-THIRDS OF ALL MONTEREY PENINSULA IS ILLEGAL - IN TWO DIFFERENT WAYS!
Two-Thirds of all water we get from our kitchen sinks on Monterey Peninsula is ILLEGAL. The primary water supplier for the 105,000 residents of our Monterey Peninsula, Cal-Am, has NO LEGAL RIGHT to pump 70 percent of the water it is taking from the Carmel River.

Any new water connection will worsen an existing illegal situation and worsen a critical health and safety issue for our Monterey Peninsula.

Any new water connection will be pumping illegal water as well.

In addition there is abundant evidence that existing levels of water pumped from the Carmel River is killing US-Endangered Species Act (ESA) listed species! - the West Coast Steelhead (*Oncorhynchus mykiss*) and the California Red-Legged Frog (*Rana aurora draytonii* or "CRLF").

MONTEREY PENINSULA WATER EMERGENCY
The Monterey Peninsula Water Management District declared a "Water Supply Emergency" in 1998 which is still in effect in Nov 2000. A previous Water Supply Emergency was declared in 1990 and was temporarily rescinded prior to 1998 when an additional 150 acre feet of water was added to the Cal-Am system.

WATER WAITING LISTS
Water supply is so constrained, jurisdictions in the Monterey Peninsula Water Management District have Water Waiting Lists (e.g. Monterey County, Pacific Grove, Monterey, Carmel).

CARMEL RIVER IS A FULLY APPROPRIATED STREAM (FAS)
"The Carmel River watershed was added to to the SWRCB's List of Fully Appropriated Streams (FAS) for the period May 1 to Dec 31 (pursuant to SWRCB decision 1632 in 1995)." This means no additional water rights from that source can be had. The Carmel River supplies over 70 percent of the water for Cal-Am to provide to the Monterey Peninsula.

THE MONTEREY PENINSULA HAS A HUGE WATER OVERPUMPING SHORTAGE - NOW!

Physical Water Limit
The Monterey Peninsula is in a permanent state of drought. Its primary water source, the Carmel River runs dry even during wet years.

In 1977 only 3,500 acre feet of water rained into and ran down the Carmel River, yet with the Peninsula used over 18,000 acre feet of water in 1987. More than five times as much water!

More than two-thirds (71 percent) of the water for the Monterey

Peninsula is pumped from the Carmel River watershed. The remainder is pumped from the Seaside basin. Both have been officially declared as overdrafted.

In 1990 the total water allocation (maximum amount of water for human use) for our Monterey Peninsula was reduced from 20,000 af / year to some 17,300 af / year.

In 1977 Monterey Peninsula residents were forced into 50% rationing by the Public Utilities Commission. At that time (1977) humans were endangering the Carmel River by overpumping. In spite of that stern warning, local government officials have repeatedly refused to stop approving new water hookups.

In 1977-78 the State Legislature created the Monterey Peninsula Water Management District which removed the rationing and moratorium. This resulted in a rapid increase in the number of hookups. Since the 1978 rationing and moratorium, the Monterey Peninsula Water Management District has allowed more than seven thousand (~7,800) new water connections and their attendant pumping and river dewatering. This includes three (3) finished golf courses. It does not include three (3) more approved golf courses or three further with approvals that haven't been finished or the three further proposed golf courses which the Water District is expected to allow.

This increase in hookups caused a decrease in the amount of water available for everyone and an increase in dewatering of the Carmel River from overpumping, leading to habitat harm for many animals and plants including "continuing take" of the FESA listed West Coast Steelhead (*Oncorhynchus mykiss*) Steelhead trout and the FESA listed California Red-legged frog.

The increased pumping also increases the risk of harm to physical health and safety to Peninsula residents from losses of water quantity and quality.

CARMEL RIVER PUMPED FAR BEYOND SUSTAINABILITY

Most of the Monterey Peninsula's water is pumped from the Carmel River by Cal-Am, owned by American WaterWorks of New Jersey. Smaller amounts are pumped by Cal-Am from a Seaside aquifer and by some 200 private wells on the Carmel River.

In turning down the September Ranch Project in Sept. 1999 Judge Silver cited how in 1988 Monterey County "as an urgency ordinance, adopted Ordinance 3310. (AR 1209) The findings in support of the Ordinance stated '(A)s a result of such excessive and expanded water usage in the areas defined herein, the potential exists that Monterey County's allocation of water will be exhausted so as to pose an immediate threat

to the public health, safety, or welfare.' Because of this perceived crisis the Ordinance prohibited new development, with certain defined exceptions, which resulted in an increase in the use of water over that level of use existing at the time the Ordinance was applied to the property."

Even pro-Dam advocates admit the Peninsula is out of water - former Water Board member Jim Hughes stated in his (losing) 1999 campaign "I tell cities - We're out of water. So don't come asking me for any." Monterey County Association of Realtors spokesperson Sheryl McKenzie said "There's no water out there." at Water Transfer hearing May 15,00

SEASIDE BASIN OVERPUMPED TOO

All remaining Cal-Am water which does not come from the Carmel River is pumped from the Seaside Basin. "The Seaside Basin is already in an overdraft status. See the Final EIR on this project (e.g. pp. 155, 157, 158) and the Report of California Coastal Commission Staff dated April 22, 1998 (e.g. pp. 4 and 25-28). That same conclusion has been reached by the [Water] District's own consultant. Any further users of the Seaside Basin will only exacerbate the present overdraft condition, invite sea water intrusion thereby potentially destroying the resource for all users, and place greater pressure on the Carmel River basin in direct contravention of the orders of the California State Water Resources Control Board (SWRCB). SWRCB has ordered Cal-Am to reduce its production from the Carmel River Basin (or suffer fines, which fines may be passed on to Cal-Am's ratepayers) and has directed Cal-Am to maximize its use of the Seaside Basin. Under the District's Rule 22 D the District should not grant a permit 'if the Board finds and determines that the permit: 1. Will create an overdraft or increase an existing overdraft; or 2. Will adversely affect that ability of existing systems to provide water to users.'" (Letter to MPWMD from Cal-Am's Counsel September 7, 1999)

ENDANGERED SPECIES TAKEN AND THREATENED

"The Carmel River goes dry - even in good years. It is killing steelhead." US-National Marine Fisheries Service, Senior Advisor Joseph Blum in formal comments to the California Department of Fish and Game Commission Apr 6, 2001 singling out the Carmel river of all rivers in the state because of the dewatering impacts to the ESA listed steelhead and California Red-Legged Frog.

During the 1987 to 1995 time period the steelhead trout run in the Carmel River dropped. It fell to ZERO for four years at the beginning of this decade. Only single digit numbers of the species showed up for 6 of the last 10 years. This, among other things, caused the steelhead to be federally listed and protected under the Endangered

Species Act in 1997.

The California Red-legged Frog was also recently listed (1996) by the US-Fish & Wildlife Service. The headwaters of the Carmel River host one of the three "largest" (really meaning non-tiny) remaining populations of the frog.

In 1997 there was a serious "take" of the steelhead AND the frog, which experts find almost certainly due to overpumping of the Carmel River.

Frog Take - US-FWS letter Dec 10 1997
"Existing water diversions along the Carmel River may be resulting in the take of the threatened The California Red-Legged Frog (*Rana aurora draytonii*)."

"The Service is concerned that water diversions along the Carmel River may be resulting in the take of the threatened California Red-Legged Frog."

Frog Take - US-FWS letter July 20 1997 to the SWRCB Chairman
Titled "Potential Endangered Species Act Violation for the California Red-Legged Frog from Water Diversions on the Carmel River, Monterey County, California."

Watershed Drawdown Impacting Fisheries:
"WR 95-10 Conditions are inadequate in light of the subsequent ESA listing for steelhead and designation of critical habitat and because steelhead are continuing to be taken every year due to the overpumping."
- Comments by Steve Edmondson, Team Leader, Fishery Biologist in the Northern California Habitat Conservation Division of the United States Department of Commerce, National Marine Fisheries Service (NMFS) in testimony to California Water Resources Control Board May 30, 2000 in Monterey, CA.

US-National Marine Fisheries Service, SW Region letter Nov 6 1991
Draft EIR comments:
"Excessive drawdown of [the Carmel Valley and Seaside] aquifers results in a dry lower Carmel River, such that river flow does not reach the sea, preventing steelhead migration." "As the populations and water demand grow, mandatory water rationing and water shortages during droughts will be more severe, and fisheries impacts could worsen."

"We are not sure whether either the CDFG instream flow recommendations or the MPWMD flow recommendations are appropriate to adequately restore the steelhead run."

Steelhead Take - US-Nat. Marine Fisheries Svc, SW Region letter Oct 10,97
"...Water District Senior Fisheries Biologist Dave Dettman counted 289 dead juvenile steelhead in the Robinson Canyon to Shulte Road reach of the Carmel River. Mr. Dettman observed that the cause of the fish kill was due to no, or minimal flows, and high water temperatures. The fish kill was attributed to pumping rates at

Cal-Am wells in excess of Stream flows, and recharge capacity. If these allegations are true, Cal-Am's practices could be significantly affecting a fish species that NMFS has listed for protection under the ESA."

Overpumping a stream reduces it to pools connected only by dry riverbed.
SWRCB Memorandum Nov 1999 in File 262.0(27-08-01) - "[W]hen the fish are confined to pools such as this, the opportunity for predation is significantly higher than during periods of continuous flow..." (pg 7)

"[L]ow [streamflow] flow periods are times when aquatic organisms are most susceptible to predation. Although the stream habitat may exhibit the capability to support large numbers of fish at a relatively low flow, there are significant population declines among aquatic organisms during these periods because the aquatic habitat is more accessible to land and avian predators." (pg 10)

Carmel River Steelhead Population Importance:
US-National Marine Fisheries Service, SW Region letter May 20 1996
"...given the importance of the Carmel River Steelhead population for recovery of steelhead coastwide,..."

This adverse physical environmental impact of dewatering a river is distinct from a legal right to pump water. Monterey County agencies are uniformly ignoring this distinction as of May 1999 and asserting that if a party has a legal right to water - no physical environmental impact exists. Agencies blatantly ignoring this include: The Monterey Water Management District, Monterey County (Pebble Beach Lot Program EIR), Pacific Grove (dozens of building permits per month), Seaside (Mariott Hotel) and Sand City (Dunes Hotel).

Also during this 1978 to 1995 period California-American Water Company (the Peninsula's main water provider) was pumping a significant amount of water without legal water rights. In 1995, after dragging their feet for eight (8) years since the first complaint, the CWRCB ordered Cal-Am to cut back their water pumping to the amount of legal rights they owned. This cut some 11,000 af out of a normal 16,000 af of water pumped yearly. Failing to comply with the 1995 order Cal-Am was fined \$168,000 in 1997 by the CWRCB.

NEW FIRE PROTECTION NEEDS AS OF MARCH 1999
The PUC Requires Cal-Am to provide fire service water connections to any property within the Cal-Am service area regardless of where the property's water supply originates.
"This ... has the potential to make it more difficult for Cal-Am to achieve the water production goal set by the State Water Resources Control Board (SWRCB) in its Order No. 95-10. Fire services require periodic flushing and testing, and fire hydrant testing contributes to the amount of unaccounted water use within the Cal-Am system."

-MPWMD Staff Agenda Report pg 53, March 15 1999

NEW CONNECTIONS CONTINUE

In the meantime, in the very face of "severe" rationing, Cal-Am and the District continue to allow new users to hook up to their water system. Among other projects Cal-Am recently hooked up a Car Wash at the mouth of Carmel Valley. Pacific Grove approved a 50,000 square foot expansion of a Supermarket on May 6 1998. Pebble Beach Company proposes another golf course and 350 houses. Carmel Valley's September Ranch was approved in December 1998 to build 100 houses and an Equestrian center. Although a judge turned the project down in Sept. 1999 in part because of a lack of water, the developer intends to try again.

Monterey Peninsula Water Problem Definition

Our Peninsula needs enough water during drought years to fully protect the public trust resources of the Seaside Basin, the Carmel River and its fish, vegetation and animals and to supply current users. Currently the Carmel River is overpumped in excess of legal rights and to the detriment of the public trust resources. The problem is increasing because new water hookups are approved regularly.

The cause of the problem is that Peninsula government has been unwilling to live within its water resource limits. No "Carrying Capacity" population number has ever been established for the existing water available.
In Cadiz, Spain the water was literally turned off at night (9pm to 7am) from March 1992 to June 1995 due to "the worst drought of the century". We can look forward to Cadiz's problem here if we continue to avoid responsibility for staying within the limits of our existing water resources.

(1) Cal-Am Water Production (1940 - 1993) Final EIR March 1994. (and MPWMD Manager Darby Feurst phone call Aug 1, 1997.)

(2) Non-Cal-Am pumping in Carmel River Watershed (MPWMD Manager Darby Feurst phone call Aug 1, 1997.)
Alluvial Aquifer wells 1862 af (July 95 - June 96)
Upland wells 201 af (July 95 - June 96)
Total 2063 af

Seaside 4429

(3) Estimate from historical pumping of Carmel River and its effects on Steelhead. There is some concern that no water can be drawn from the river in severe drought years without harming the endangered Steelhead and other river dependent life. To insure the recovery of the Steelhead we must use conservative caution with a reasonable margin for error.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Overpumping a Water Supply System.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 788 - PUBLIC TRUST WATER QUANTITY LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Public Trust Water Quantity loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Public Trust water needs often come BEFORE additional water demands.
The Federal Endangered Species Act compliance supersedes ALL state water rights law. Several species (Coho Salmon, Steelhead Trout, California Red-legged Frog) are seriously endangered and federally listed and require substantial amounts of water from streams, groundwater and surface water in California that is also used by people and agriculture. Water for them takes precedence to pumping drinking water.

Under CEQA alone, economic factors can override or outweigh, environmental impacts on any species. However, under the US-ESA, economic factors cannot override or outweigh, environmental impacts on a listed species. The US-ESA mandates that listed species must be protected "whatever the cost."

The Supreme Court wrote in *Sweethome v Babbitt*: "The plain intent of Congress in enacting this statute," we recognized, "was to halt and reverse the trend toward species extinction, WHATEVER THE COST.
(emphasis added) This is reflected not only in the stated policies of the Act, but in literally every section of the statute."
Sweethome v Babbitt 98 S.Ct., at 2297.

Water: Legal vs Physical Water impacts
The Physical Impact from an Increase of current pumping is different from a Legal water rights analysis.

The Carmel River is currently overpumped at a certain level. At the current level the overpumping threatens two officially federally listed species by further dewatering the Carmel River.

"WR 95-10 Conditions are inadequate in light of the subsequent

Endangered Species Act listing for steelhead and designation of critical habitat and because steelhead are continuing to be taken every year due to the overpumping."

Comments by Steve Edmondson, Team Leader, Fishery Biologist in the Northern California Habitat Conservation Division of the United States Department of Commerce, National Marine Fisheries Service (NMFS) in testimony to California Water Resources Control Board May 30, 2000 in Monterey, CA.

This project will increase that pumping by a large amount, by some number of acre feet of water per year. The project's increase in pumping will further significantly threaten at least two species including the California Red-Legged Frog (*Rana aurora draytonii*), and the West Coast Steelhead (*Oncorhynchus mykiss*) and their habitat. The project's increase in pumping will further significantly impact the quantity and quality of the Peninsula drinking water supply.

"CEQA Guideline 15151. Standards for Adequacy of an EIR Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts."

It is not any favor to the applicant to allow the EIR to proceed without this subject discussion. To be legally adequate this must be described, even if you find it unpersuasive.

We recommend that an absolute threshold of significance is reached when more water is physically pumped than is refilled by direct and indirect recharge. Any additional water pumping, no matter how small, causes a significant dewatering impact when the Water table is permanently descending.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Public Trust Water Quantity loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 789 - OZONE AS A SOIL FUMIGANT ALTERNATIVE.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Ozone as a Soil Fumigant Alternative.

SoilZone Inc of Sunnyvale, CA has patented a Methyl Bromide Alternative consisting of using Ozone instead of Methyl Bromide (MB). The method kills pests and then within minutes converts into regular oxygen. It is far safer for humans to handle and for those who live and work in the area it is applied. The costs per acre are roughly equivalent to MB. US-EPA's Bill Thomas said "The preliminary research results with ozone look very promising. I think it is worth pursuing." Mar 8 1998 West Magazine (San Jose Mercury)

For more info: ozone21@worldnet.att.net; and
www.epa.gov/ozone/mbr/mbrqa.html

This Alternative does not require any non-off-the shelf technology.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or

assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

* 790 - STEAM AS A SOIL FUMIGANT (E.G. METHYL BROMIDE) ALTERNATIVE.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of Steam as a Soil Fumigant (e.g. Methyl Bromide) Alternative.

"Steaming can be a viable alternative to methyl bromide for soil and

growth media greenhouses and some small-scale field nurseries."

The advantages of steam sterilization are that it can be a highly efficient, cost effective technology for the control of soil-borne pathogens, pests and weeds; it eliminates the need for tarps and fumigants; it can be a neat, clean, and easy to use control technology, leaving no toxic residues or fumes and therefore less harmful to other greenhouse crops and growers (with no toxic fumes, workers can harvest or plant new cuttings in adjacent fields). In addition it is non-selective (lethal to all pests). Steam requires little aeration time steamed soils can be planted as soon as they cool, whereas chemically treated soils can have a relatively long treatment and aeration period) and it can be combined with other pest management practices.

"The steam rake and the steam blade have been used extensively in nursery fields."

US-Environmental Protection Agency "Alternatives to Methyl Bromide, Vol 3"

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

*** 791 - ELECTRICAL STERILIZATION OF FIELDS SOIL FUMIGANT ALTERNATIVE.**

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Electrical Sterilization of Fields Soil Fumigant Alternative.

High voltage (20,000 to 50,000 volt), low amperage electrical charges applied to soils can sterilize fields quickly, without toxic residue or fumes, especially in wet soils. It eliminates the need for tarps and fumigants; it can be a neat, clean, and easy to use control technology, leaving no toxic residues or fumes and therefore less harmful to other greenhouse crops and growers (with no toxic fumes, workers can harvest or plant new cuttings in adjacent fields). In addition it is non-selective (lethal to all pests). Electrical charges require little aeration time. Soils can be planted immediately, whereas chemically treated soils can have a relatively long treatment and aeration period) and it can be combined with other pest management practices. It works well in wet soils where steam is less effective.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

*** 792 - AIR POLLUTION-PAVING (HOT OIL SMOKE).**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Paving (hot oil smoke).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The Paving process creates toxic concentrated hydrocarbon air pollution.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Paving (hot oil smoke).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 793 - FIREWORKS EVENTS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Fireworks Events.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Fireworks Events can cause large concentrated toxic and radioactive air pollution and hazardous waste.

Green fireworks explosions are caused by barium, bright reds or crimson colors are caused with strontium.

All of barium's water and acid soluble compounds are poisonous. Barium carbonate is used as a rat poison.

Strontium is a radioactive metal, one isotope having a half-life of 28 years.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Fireworks Events.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 794 - AIR POLLUTION-FOREST FIRES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Air Pollution-Forest Fires.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Forest Fires increase the baseline of a region's air pollution. Even though natural, the millions of pounds of particulates need to be included in air pollution limits for an air quality management plan.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Air Pollution-Forest Fires.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 795 - ACTIVITY INCREASING FIRE DANGER.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Activity increasing Fire Danger.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Large area tire storage increases fire danger as tire fires are often
ignited by natural lightning.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Activity increasing Fire Danger.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 796 - FIRE FIGHTING IMPACTS.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Fire Fighting Impacts.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Fire fighting can cause many environmental impacts. Bulldozing for fire breaks and access can leave geological scars which never heal and cause increased erosion. The 1998? fire fighting operation in Monterey County's Ventana Wilderness some 92 miles of bulldozer roads were cut.

Backfires can trap animals between the two fire lines.

Fire fighting aircraft cause noise affecting humans living nearby and wild animals.

Fire fighting helicopters can use millions of gallons (many acre feet) of water in an area under water use restrictions.

Fire retardant can change the soil composition and cause water and air pollution both before and after it is burned.

Please list all chemicals used in fire retarding.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Fire Fighting Impacts.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 797 - PRESCRIBED TREE OR VEGETATION BURNING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Prescribed Tree or Vegetation Burning.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Deliberate fires, or Prescribed Tree or Vegetation Burning can cause a number of significant environmental impacts including: human death, animal death, vegetation death, both leading to species extinction, human health harm, animal health harm, home and building structure loss, structure damage, wildlife habitat loss, explosions, release or creation of toxic air pollutants, increased waterbody pollution, from toxics, increased erosion from vegetation denuded soils, soil death and

impairment, aircraft range limits, visual aesthetic loss (ugly smokey skies and orange shadows), and repugnant smells.

NO CONTROL

Prescribed burns often get out of control and damage property. They would more accurately be called "Prescribed Arson." As Stephen J. Pyne of Arizona State University points out, some of the most deadly fires of the past 20 years were prescribed burns gone awry." - Scientific American, Aug 2000

According to the National Interagency Fire Center 257 Prescribed Burn fires got "out of hand." Ibid

"A blaze that was set to clear [900 acres of] brush, raged out of control over the weekend and spread into Los Alamos, burned homes Wednesday, forcing the evacuation of al 11,000 residents in the town, site of America's most storied nuclear laboratory." AP May 11, 2000

The [Cerro Grande] fire had burned at least 1,950 acres as of May 9, 2000

A further 14,000 people from surrounding communities were also ordered out of their homes. Some 405 families were left homeless. The fire had burned 46,000 acres as of May 17, 00. Preliminary estimates put the damage at 1 Billion dollars.

The Cerro Grande fire "raged for more than two weeks, consuming some 50,000 acres of National Forest and land on ad around Los Alamos National Laboratory. It destroyed 230 or so homes, displaced thousands of people, came perilously close to a hazardous-materials sites on the nuclear weapons research facility, scorched percious habitat for the threatened Jemez Mountains salamander..." -Scientific American, Aug 2000

"The US Forest service said it did the right thing in igniting a controlled fire that leaped out of control and scorched more than 700 acres this week." The "Hemlock Burn" fire near Running Springs, California destroyed an unoccupied homestead with a cabin, barn and shed and prompted the evacuation of a campground. AP June 17, 2001

AIR POLLUTION

Prescribed burns always cause particulate air pollution.

Since 1996 the federal government has burned almost 8 million acres of "national forest, park land, and public ranges" - an area equal to New Jersey and Connecticut combined. Fourteen percent (14%) of the fires burned out of control.

* "There are very few long-term studies on the effects of fire applied to ecosystems, says Ronald Myers, director of fire management at the nature Conservancy." There are virtually no data on how various treatments mimic the ecological functions of fire." -Scientific American, Aug 2000

When the Fort Ord, California military base closed, the US-Army left some 15 square miles contaminated with explosives, ammunition, rockets, bombs and chemical weapons.

Rather than allow public review of their burning plans and good faith response to public concerns, the ARMY planned to burn 18,000 acres in secret and refused to involve the public in the decision.

100 acre fire conveniently expands to 700 acres On August 25th 1997, the Army began burning what they claimed would only be some 100 acres. With explosives "crackling like popcorn" some burning ammunition flew great distances and started wildfires that got out of control. They tried to put it out but "there was too much ordnance detonating." Before the ARMY could contain the fire it had burned some 700 acres. By an astounding coincidence they Army had hoped to burn all of those 700 acres, but had been prevented from it by residents persistent complaints about smoke in their homes and school children being choked in classrooms.

The Army admits knowing that exploding ordnance can, with 100 percent certainty, fly 4000 feet in any direction (one and a half mile diameter) and begin secondary fires. Ft Ord EE/CA 1994

The Air Pollution Control District was so angry they sued the ARMY. The smoke plume is described in court documents as extending some thirteen miles down the Salinas Valley. Air District experts describe the burn as "gross disregard for not only the law but for the health and safety of the community."

Twenty-three (23) homes in Lewiston, near Redding, California were destroyed by a prescribed burn set by the Bureau of Land Management in July 1999. As of May, 2000 225 claims were filed, but the government has settled only 75 paying out a mere \$270,000 total.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Prescribed Tree or Vegetation Burning.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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* 798 - POISON OAK BURNING.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Poison Oak Burning.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

In California, the poison oak shrub or vine is everywhere except the "inner city", the hotter deserts, and above 4,000 feet elevation. Shrubs are usually 12" to 30" high, or a tree-climbing vine, with triple leaflets and short, smooth hair -Boy Scouts of America website

"Never burn the plants. The urushiol can spread in the smoke and cause serious lung irritation." - FDA Consumer magazine (September 1996)

"Urushiol can be vaporized when exposed to a fire. If you have a neighbor who is burning poison ivy, the resin will rise with the smoke. If you are downwind when the resin cools off and rains back down to earth, you could receive a coat of urushiol on any uncovered areas resulting in a surprise case of poison ivy." "Under no circumstances should you burn the plant; the smoke is as potent as the plant itself. Inhaling the smoke can produce a systemic reaction, including potentially serious, and life-threatening, lung inflammation." Charles H. Booras, M.D. Board certified Family Physician since 1984. Listed in "The Best Doctors in America", 2000. Listed in "How to Find the Best Doctors: Florida - 1st Edition".

Caution: Burning poison oak can result in a dangerous smoke that can cause severe symptoms to the eyes, nose, throat and lungs. -UC Davis Health System Website

Burning poison oak results in an extremely dangerous smoke that can cause severe symptoms to the eyes, nose, throat and lungs. A severe allergic reaction from inhaling the smoke, "anaphylaxis", is life-threatening.

Burning is not recommended as inhaling dust and ash from the smoke can result in poisoning of the lungs that can require hospitalization.

"Never burn the plants. The urushiol carried in smoke from burning poison ivy is extremely toxic. It can cause lung infections and a rash all over one's body." -The Cooperative Extension Service includes The University of Georgia and Ft. Valley State University, the U.S. Department of Agriculture and counties of the state of Georgia.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of

Poison Oak Burning.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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12. Please state the most extreme values which could be encountered.

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16. Please quantify the length of time this impact would last.

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* 799 - CREOSOTE SMOKE FROM BURNING BRUSH.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Creosote Smoke From Burning Brush.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

CREOSOTE is on California's Prop 65 List of Known Carcinogens.
Creosote is a wood preservative on EPA's list of materials classified as restricted use in 1985. It is in the Group B1 Pesticides "Probable Human Carcinogens with Limited Human Evidence"

"Restricted Use" means:
"A pesticide that is available for purchase and use only by certified pesticide applicators or persons under their direct supervision. This designation is assigned to a pesticide product because of its relatively high degree of potential human and/or environmental hazard."
Source: www.epa.gov/pesticides/carlist/table.htm updated June 11, 1998
Creosote also has a powerfully repugnant smell that lasts years and on hot days can be detected dozens of meters from the source.

Please discuss all uses and especially distances from water, wetlands or other wild habitat and the potential impacts on threatened and endangered species.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Creosote Smoke From Burning Brush.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 800 - SMOKE HARM TO ENDANGERED SPECIES.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Smoke Harm to Endangered Species.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Smoke Harm to Endangered Species.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 801 - BURNING PLANTS WITH ABSORBED TOXICS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Burning Plants with Absorbed Toxics.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Burning Plants with Absorbed Toxics.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 802 - SCHOOL ABSENTEEISM.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
School Absenteeism.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

School Absenteeism Rises When Air Pollution Rises
"Effects of ambient air pollution on School Absenteeism Due to Respiratory Illnesses", Report sponsored in part by US-EPA & CARB.
www.epidemiology.com

Ozone increases in the air were found to be associated with a 63% increase in illness related absence rates and an 83% increase in respiratory illnesses.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of School Absenteeism.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 803 - GLASSWOOL FIBERS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Glasswool fibers.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Glasswool fibers, used in household insulation, are known carcinogens on the California Proposition 65 list.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Glasswool fibers.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 804 - SPECTROMETER ASSAY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Spectrometer Assay.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Spectrometry can reliably identify specific molecules, but requires

knowing exactly which molecule to detect. The spectrographic signature of some chemicals can mask and hide others. Sample must be prepared for a specific chemical.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Spectrometer Assay.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 805 - BIO-ASSAY.

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of Bio-Assay.

Detection of pesticides and toxics can be widened by magnitudes over spectroscopy using a bioassay such as Ah-Immuno-Assay(tm) or CALUX (tm). They are used widely to detect dioxins and PCBs. They can detect in range of parts per trillion with sample of only a few grams. One sample test cost is around \$200 in 2001.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

* 806 - USE OF THE TOP 20 HAZARDOUS SUBSTANCES ATSDR/EPA PRIORITY LIST.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of

Use of the Top 20 Hazardous Substances ATSDR/EPA Priority List.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

ATSDR - ATSDR/EPA Top 20 Hazardous Substances 1995 Agency for Toxic Substances and Disease Registry (Under the U.S. Public Health Service)

This annual evaluation activity fulfills the conditions of CERCLA section 104 (i), as amended, which requires ATSDR and EPA to revise the priority list of hazardous substances (N=275) periodically to include additional hazardous substances.

Each chemical is identified with a Rank Number and includes an ATSDR Public Health Statement.

The Public Health Statements were prepared by the ATSDR Division of Toxicology. They provide general information on the properties of the chemical and answer many health concerns that are voiced by community groups. A full list of the ATSDR Toxicologic Profiles and Public Health Statements can be accessed through the ATSDR HazDat.

The full priority list of hazardous substances (N=275) for 1995 can be accessed HERE!
Top 20 Substances:

Lead
Arsenic
Mercury, Metallic
Vinyl Chloride
Benzene
Polychlorinated Biphenyls (PCBs)
Cadmium

Benzo(a)pyrene
Chloroform
Benzo(b)fluoranthene
DDT, P'P'-
Aroclor 1260
Trichloroethylene

Aroclor 1254
Chromium(+6)
Chlordane
Dibenz[a,h]anthracene

Hexachlorobutadiene
DDD,P'P'-
Dieldrin

U.S. Department of Health and Human Services Public Health Service
Charlie Xintaras / chx1@cdc.gov;
http://atsdr1.atsdr.cdc.gov:8080/cxcx3.html

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Use of the Top 20 Hazardous Substances ATSDR/EPA Priority List.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that

number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 807 - CHEMICAL AND PESTICIDE USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Chemical and Pesticide Use.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Pesticides are deadly to humans and animals. They are intended and designed to kill animal and plant life. Almost all pesticides kill unintended victims. In the words of the US-EPA "Pesticides are not 'safe.' They are produced and used specifically because they are toxic to something."

HUMAN PESTICIDE POISONINGS

"As many as 67,000 cases of human pesticide poisoning occur worldwide each year, some of which are fatal." Environmental Science; Morgan, Moran & Weirsma; W.C. Brown Pub. 1993, p 178

"Somewhere between 400,000 and 2 million people suffer from acute pesticide poisoning every year: between 10,000 and 40,000 of them die." WWF, 1990

! Pesticides are designed and applied to kill. Some 428 cases of human pesticide poisoning were reported to public officials in Monterey County during a six year period. Fifty 50 cases of human pesticide poisoning were reported in Monterey County in 1996.

U.S. industry currently uses roughly 70,000 different chemicals.
According to U.S. Environmental Protection Agency (EPA), as of October, 1996, there were 75,857 chemical substances in commercial use. The US produced some 435 Billion pounds of synthetic chemicals in 1992 which

is about 1600 pounds per American.

There are about 630 different "active ingredients" in pesticides worldwide. In real-world use, these main ingredients are combined with other chemicals (some are called "inert ingredients") to make several thousand toxic formulations -- but the basic active ingredients number about 630. In 1992 4.5 Billion pounds of pesticides were used in the U.S. which is about 18 pounds per person.

The purpose of a pesticide is to kill living things, so it is no surprise that these 630 chemicals are all toxic. In many cases -- especially the newer pesticides -- they are very toxic. For example, the most commonly-used insecticide is called chlorpyrifos (trade name: Dursban). Dursban attacks the central nervous system so effectively that one-fifth of an ounce is sufficient to kill an adult human. A fraction of that amount could kill a child.

According to the 1999 book "Our Stolen Future" - virtually anyone willing to put up the \$2000 for tests will find at least 250 chemical contaminants in their own body fat.

In addition to the original chemicals, unique metabolites and degradation products can develop during use and disposal. To give but one example: trimethylamine can be converted to the powerful carcinogen, dimethylnitrosamine.

The Clean Air Act, Clean Water Act, Resource Conservation and Recovery Act, Emergency Planning and Community Right-to-Know Act (Sec 313), and Occupational Safety and Health Act each regulate a set of pollutants as toxic or hazardous. Each set of pollutants is significantly different from the others.

! 1,134 pollutants or classes of pollutants are regulated under at least one of these five statutes.

! Almost 800 are regulated under only one health protection law.

! A total of 579 pollutants are regulated under at least one of three statutes--the Clean Air Act, Clean Water Act, and Resource Conservation and Recovery Act.

! Only 63 chemicals are regulated under all three laws.

! Only 49 chemicals are regulated under all five health protection laws.

According to Yale University professor John Wargo in his new book "OUR CHILDREN'S TOXIC LEGACY" -

! Nearly one-third of the pesticides now in use are suspected of causing cancer in laboratory animals.[pg.5]

! Another third of the pesticides in use are thought capable of disrupting the human nervous system;

! Many others are suspected of disrupting the endocrine (hormone)

system that regulates growth, development and healthy functioning in fetuses, children, and adults.

Monterey County industry generated 572 tons of pesticide waste in 1986 and was projected to generate 540 tons in 2000. Monterey County Hazardous Waste management Plan 1989 p 5-22

1. LIST OF POTENTIAL POISONS

For each potentially chemically hazardous Product proposed for use or normally used (e.g. pesticides, products with heavy metals, fuels, or air polluting activities such as diesel vehicles and asphalt roofing, etc.) please clearly describe:

A. all potentially hazardous Chemical components including:
Proposition 65 Chemicals
Fertilizers
Commercial Pesticides
Home Pesticides
Petrochemicals

Fertilizer Nitrate
Fertilizer Flourine
Chlorinated hydrocarbon pesticides (e.g. DDT, aldrin, chlordane)
Swimming pool chlorine

Chlorocycloclodiene pesticides (e.g. Aldrin)
Carbamate pesticides (e.g. Carbaryl)
Inorganic pesticide compounds (e.g. Arsenic, NaF)
Chlorocycloclodiene pesticides (e.g. Aldrin)
Carbamate pesticides (e.g. Carbaryl)

Organophosphorus pesticide compounds (e.g. Diazinon and Malathion)
Glyphosate and its metabolites aminomethylphosphonic acid and formaldehyde (a prop 65 carcinogen)
PCBs
Dioxins
Flourine in Fertilizers
Pentachlorophenol in Telephone poles (Prop 65 known carcinogen)

B. All chemicals EPA lists as "inerts." "Inerts" are sometimes more deadly than the active chemicals.

Commercial formulations of pesticides are normally different than the pure chemical formulations used for EPA registration toxicity testing.

This can make the toxicity testing underestimate, sometimes severely, the toxic impacts of the product as applied.

There are three types of chemical additives that are missing from most testing: contaminants of manufacturing processes, toxic waste deliberately added from chemical reactor cleaning processes and "inert" ingredients. Source: Warren Porter, et al., "Endocrine, immune and behavioral effects of aldicarb (carbamate), atrazine (triazine) and nitrate (fertilizer) mixtures at groundwater concentrations," Toxicology and Industrial Health (1999) 15, 133-150.
University of Wisconsin-Madison.

A Federal Court wrote:
"EPA has found approximately 40 "inert ingredients" to be of toxicological concern after testing them and has determined that approximately 65 others are potentially toxic." "More than two

thousand inert ingredients are used in pesticides however, and most of them have not been tested by EPA or evaluated for toxicity." NCAMP v. EPA 941 F.Supp 197, 198 (1996)

Inerts can be solvents, organic soaps or surfactants that hasten pesticide penetration through the cuticle and the stomata of leaves. The analogous surfaces in animals are the skin and the respiratory system.

Standard toxicological tests are typically performed without testing the inerts used in commercial preparations that can alter the properties of pesticides and influence the route of exposure. Source: Warren Porter, et al., "Endocrine, immune and behavioral effects of aldicarb (carbamate), atrazine (triazine) and nitrate (fertilizer) mixtures at groundwater concentrations," Toxicology and Industrial Health (1999) 15, 133-150. University of Wisconsin-Madison.

In 1984, the U.S. Environmental Protection Agency (EPA) began to take its first, crude look at the approximately 1,450 "inert" ingredients it has registered for unlabeled use in U.S. pesticide formulations. EPA subsequently released a list of the ingredients and made a number of startling admissions:

1. Approximately 40 of the "inert" ingredients are known to cause cancer, nerve damage, other chronic effects, or adverse reproductive effects. These "inerts" include asbestos, carbon tetrachloride (banned as an active pesticide ingredient), and trichloroethylene. In 1987, EPA indicated these inerts must be listed on the pesticide label, but there is no evidence that EPA enforces this policy. All the other 1,400 or so inert ingredients do not have to be listed on pesticide labels.

2. Approximately 65 of the secret ingredients are classified "potentially toxic inerts/high priority for testing" because their chemical structure or existing data suggest toxicity. These "inerts" include xylene, cresols, and methyl bromide (a highly toxic fumigant and neurotoxin). Yet U.S. EPA decided not to require testing for these ingredients.

3. Approximately 1,050 of the secret ingredients are considered "inerts of unknown toxicity." EPA does not require testing to determine their toxicity. These ingredients include:

(a) Chemicals known to be toxic (e.g., POEA or polyoxyethyleneamine, naphthalene, and zinc). POEA is present in Monsanto's glyphosate formulations Roundup and Vision. The POEA is 400 times more toxic to immature salmon than a glyphosate formulation, Rodeo, that contains no POEA. It belongs to a class of surfactants that have been reported to cause adverse gastrointestinal and central nervous system effects and damage to red blood cells. POEA is contaminated with 1,4-dioxane, a chemical that causes toxic effects in the liver and kidneys of

humans and various cancers in numerous animal species and is listed as a Prop 65 human carcinogen.

(b) Mixtures of toxic chemicals (e.g., chlorinated rubber, "Chicago sludge," and tall oil, byproducts of paper manufacturing).

(c) Compounds that would appear to be problematic because they belong to chemical groups of concern (e.g., toluene in toluene sulfonate, benzene in strontium dodecylbenzene sulfonate, and cresol in 2,6-di-tert-butyl-4-cresol).

(d) "Blacked-out" chemicals. Approximately 295 inerts have been "blacked-out" since 1985 while EPA supposedly considers whether to release their names (they still would not be listed on the pesticide label). EPA currently is being sued by a citizens' group to reveal the names of these ingredients.

(e) Known endocrine disruptors including nonylphenols and bisphenol-A.

4. Approximately 300 "inerts of minimal concern" include ingredients considered innocuous - chemicals that may be toxic but whose current use patterns supposedly "will not adversely affect public health and the environment."

5. Petroleum distillates pose a particular problem. According to EPA, they "...occur in about 80% of all pesticide formulations as inerts or actives and pose significant regulatory problems." Certain components of these distillates (the polynuclear aromatic hydrocarbons) have a "high potential" for causing cancer "and the aliphatic content may pose problems as well."

Toxic Ingredients Hide as "Inerts" in Pesticides
A January 16, 1998 report "Worst Kept Secrets: Toxic Inert Ingredients in Pesticides," released by the Northwest Coalition for Alternatives to Pesticides (NCAP) documents the hazards of so-called "inert" ingredients, over 2,500 substances that are added to pesticides but are not named on product labels. Over 650 chemicals that have been identified as hazardous by federal, state, or international agencies are hiding behind the misleading word "inert" in pesticide products, according to the report.

The report lists the following examples of what it calls "active inerts"--ingredients that are or have been registered in the U.S. for use as active ingredients in some pesticide products, but have been cleared for use as inerts in other products and are listed as inerts of unknown toxicity:

-- Chlorothalonil has been classified as a probable human carcinogen by a U.S. EPA Scientific Advisory Panel.

-- Coal tar has been listed as a known human carcinogen by the International Agency for Research on Cancer.

-- Chloropicrin is a severe respiratory tract irritant and listed by U.S. EPA as a Restricted Use Pesticide.

In 1997, IARC classified two commonly used inerts as known carcinogens: crystalline quartz silica and cristobalite. Neither is required to be listed on pesticide product labels, and, based on information obtained by NCAP from a Freedom of Information Act request to EPA, crystalline quartz silica can be found as an inert ingredient in at least 1,560 pesticide products. Cristobalite, a known carcinogen (according to the International Agency for Research on Cancer), is an inert ingredient in over 1,500 pesticide products.

Butylated hydroxyanisole (BHA) is also among the 1,981 pesticide inerts included on List 3, "Inerts of Unknown Toxicity." However, in 1987 the International Agency for Research on Cancer (IARC) classified BHA as a possible carcinogen, and according to EPA's own criteria, chemicals that have been assessed as known, probable or possible carcinogens by IARC qualify for List 1. This discrepancy is particularly troubling because BHA is a commonly used antioxidant in butter, vegetable oils, cereals, baked goods, potato chips, meat products and many other foods.

C. Toxic Waste Deliberately Added From Chemical Reactor Cleaning Processes
There are three types of chemical additives that are missing from most testing: contaminants of manufacturing processes, toxic waste deliberately added from chemical reactor cleaning processes and "inert" ingredients. Source: Warren Porter, et al., "Endocrine, immune and behavioral effects of aldicarb (carbamate), atrazine (triazine) and nitrate (fertilizer) mixtures at groundwater concentrations," Toxicology and Industrial Health (1999) 15, 133-150. University of Wisconsin-Madison.

D. Contaminants of Pesticide Manufacturing Processes
There are three types of chemical additives that are missing from most testing: contaminants of manufacturing processes, toxic waste deliberately added from chemical reactor cleaning processes and "inert" ingredients. Source: Warren Porter, et al., "Endocrine, immune and behavioral effects of aldicarb (carbamate), atrazine (triazine) and nitrate (fertilizer) mixtures at groundwater concentrations," Toxicology and Industrial Health (1999) 15, 133-150. University of Wisconsin-Madison.

E. All degradation byproducts and metabolites of -
1) Each active component, and
2) Each "inert", and
3) Each Permitted Contaminant of Pesticide Manufacturing Process
(e.g. Up to 15% of a pesticide can be DDT which is still allowed by EPA and FIFRA as an "impurity" in insecticides including chlorobenilate and dicofol. (Living in the Environment pg 627)
DDE is a degradate of DDT. As little as 1.0 ppm of DDE causes higher rates of ambiguous development of sex organs of alligators.
OSF p 153

2. USE

For each of the products, chemicals, inert components and degradation byproducts identified in Section 1 which could be potentially used in this project, its construction or its operations and maintenance -

A. the maximum total pounds, kilograms or gallons of use during construction.

B. the maximum total pounds, kilograms or gallons used per year in operations.

C. how often it will be specifically tested for during construction.

D. how often it will be specifically tested for during operations.

E. Maximum Dose concentration during construction.

F. Maximum Dose concentration during operations.

3. TOXICITY

For each of the products, chemicals, inert components and degradation byproducts identified in Section 1 which could be potentially used in this project, its construction or its operations and maintenance, please:

A. WILDLIFE

1) Identify their wildlife toxicity levels (the LD50 and LC50) and the source of the data.

1a) Identify their wildlife toxicity levels (the LD-10 and LC-10) If the LD 50 & 10 values are not known please state this clearly. If the LC 50 & 10 values are not known please state this clearly.

2) identify, describe and quantify their bioaccumulative effects.

3) identify and quantify their individual and combined effects on Each US and State listed species which could potentially come in contact with the toxic materials used for this activity.

4) identify whether US-FWS or NMFS has ever completed a Biological Opinion for the chemical and the name and date of the BO if they have.

5) identify and quantify their individual and combined effects on the Habitat of EACH US and State listed species which could potentially come in contact with the toxic materials used for this activity.

6) identify and quantify their individual and combined effects on the food chain of all species listed on all US and State endangered species lists.

B. HUMANS

For each of the products, chemicals, inert components and degradation byproducts identified in Section 1 which could be potentially used in this project, its construction or its operations and maintenance - please identify and quantify the acute and chronic and subchronic impacts in each of the following areas -

1) identify and quantify their Human Carcinogenic effects

2) identify and quantify their Gender specific effects
3) identify and quantify their Birth Defect effects
4) identify and quantify their Mutagenicity effects
5) identify and quantify their Teratogenicity effects

6) identify and quantify their Central Nervous System effects
7) identify and quantify their Cardiovascular effects
8) identify and quantify their Kidney damage
9) identify and quantify their Liver damage
10) identify and quantify their Periphral Nervous System effects

11) identify and quantify their Immunological effects
12) identify and quantify their Gastrointestinal effects
13) identify and quantify their Reproductive effects
14) identify and quantify their Embryotoxicity effects
15) identify and quantify their Lung and respiratory effects

16) identify and quantify their Endocrine effects
17) identify and quantify their Blood cell disorder effects
18) identify and quantify their Skin damage
19) identify and quantify their Visual damage
20) identify and quantify their Allergic sensitization

If any of the above tests has not been conducted, please state clearly which tests those are.

In 1984 the National Research Council (NRC) of the National Academy of Sciences studied a random sample of 100 chemicals chosen to fairly represent the roughly 3000 chemicals produced each year in quantities exceeding one million pounds. The NRC concluded in 1984 that 78% of these chemicals lacked even "minimal toxicity information." [1] In 1997, Environmental Defense Fund (EDF) asked the same question to see if the chemical industry and EPA have made progress since 1984. EDF reports that, [as of 1997], 71% of the chemicals examined lack minimal toxicity information. [1] National Research Council, TOXICITY TESTING (Washington, D.C.: National Academy Press, 1984).

A Potential Resource for your Data The Registry of Toxic Effects of Chemical Substances (RTECS) is a non-bibliographic database of toxicological information on some 130,000 chemicals maintained by the National Institute for Occupational Safety and Health (NIOSH). In addition to regulatory standards and updates on governmental agency activities, RTECS contains information on six main toxicity areas: primary irritation, mutagenic effects, reproductive effects, tumorigenic effects, acute toxicity, and other multiple dose toxicity.

C. For EACH of the products, chemicals, inert components and degradation byproducts identified in Section 1 which could be potentially used in this project, its construction or its operations and maintenance - please identify and quantify their half lives.

C1. For EACH Define and quantify "Benign."

C2. For EACH Identify and quantify their degradation time to Benign.

D. For EACH identify and quantify their ability to migrate throughout the varying aquifer and river environments.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Chemical and Pesticide Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 808 - UNREPORTED PESTICIDE USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Unreported Pesticide Use.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

According to the Calif Dept of Pesticide Regulation (1995 Annual Report dated 1997 titled "Pesticides Sold in California by pounds of Active Ingredients"), unreported pesticide use is about 20 percent of total pesticide use. Obviously for some specific chemicals that percentage is higher. In the case of Diazanone it is a lot higher at about 45% of all Diazanone use. Which helps explain why Diazanone is the second most commonly detected pesticide detected in California surface waters. ("Disrupting the Balance", 1999 CPR)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Unreported Pesticide Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 809 - HOUSEHOLD PESTICIDE USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Household Pesticide Use.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

*** INCLUDE "RISE.TXT"

"Households account for 12 percent of all pesticide usage." and "they often apply four to eight times more synthetic pesticides per hectare than do farmers." Environmental Science; Morgan, Moran & Weirsma; W.C. Brown Pub. 1993, pg 177

The Rising Tide of Toxins: Pesticide Use in California by James Liebman
Global Pesticide Campaigner, Volume 7, Number 3, September 1997.
Pesticide Action Network North America, San Francisco, CA.

"The largest percentage increase in reported pesticide use (in California Counties) during this period took place in Monterey County, which saw an increase from 7 million to almost 13 million pounds, representing an 85% increase.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Household Pesticide Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 810 - PESTICIDE RESISTANT WEEDS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Pesticide Resistant Weeds.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"A 1990 American Chemical Society Report disclosed that genetic strains of 504 species of insects and mites, 273 species of weeds, and 150 species of plant pathogens (mainly fungi) are resistant to one or more pesticides." Environmental Science; Morgan, Moran & Weirsm; W.C. Brown
Pub. 1993 citing: (Green, M.B., H.M. LeBaron, and W.K. Moberg. American Chemical Society, 1990 "Managing Resistance to Agrochemicals.")

The number of Pesticide Resistant Weeds has increased from none to some 220 from 1970 to 1998. In the same time period World Pesticide use amounts has more than doubled from 1.2 million kilograms to 2.6 million kilograms. WorldWatch Mar/Apr 2000

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pesticide Resistant Weeds.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 811 - PESTICIDE RESISTANT PLANT PATHOGENS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of

Pesticide Resistant Plant Pathogens.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"A 1990 American Chemical Society Report disclosed that genetic strains of 504 species of insects and mites, 273 species of weeds, and 150 species of plant pathogens (mainly fungi) are resistant to one or more pesticides." Environmental Science; Morgan, Moran & Weirsma; W.C. Brown Pub. 1993 citing: (Green, M.B., H.M. LeBaron, and W.K. Moberg. American Chemical Society, 1990 "Managing Resistance to Agrochemicals.")

A broad mix of drugs are now found worldwide in groundwater, including anticancer agents, psychiatric drugs, and anti-inflammatory compounds. An estimated 40% of antibiotics produced in the US are fed to livestock as growth enhancers. Science News, Vol 157 (2000)

Every year U.S. farmers give some 25 million pounds of antibiotics to hogs, poultry and cattle. Scientific American, April 2001

American people only use 4.5 million pounds of antibiotics per year. Id.

This increase in antibiotics can cause resistant strains of bacteria, fungi and microbes.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pesticide Resistant Plant Pathogens.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 812 - PESTICIDE USE REDUCTION.**

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Pesticide Use Reduction.

Orvin Burnside, the past president of the Weed Science Society (herbicide justification mission) "believes that herbicide use could be reduced by 50 to 75 percent without affecting crop yields." Toxic Deception, Fagin & Lavelle, 1999 p 53

Burnside also wrote a scathing article for a weed science journal in which he called to discipline a "stepchild" of agricultural research and said that public weed scientists must redirect their activities after four decades of largely herbicide-focused research." Id.

"Despite both natural and human controls, pests and spoilage still destroy about 25 to 50 percent of crops before and after harvest."

"Overall, pesticide use in the United States could be reduced by an estimated 50 percent for a negligible increase (less than one percent) in food prices." "Farmer's costs are only a very small fraction of food costs in the U.S."

From D. Pimentel, L. McLaughlin, A. Zepp. et al., 1991 Environmental and Economic Impacts of Reducing U.S. Agricultural Pesticide Use, in D. Pimentel (ed.), 1991, Handbok of Pest Management in Agriculture, 2nd ed., CRC Press, Boca Raton, FL, pp.679-718

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

*** 813 - MALARIA REDUCTION.**

The Document appears to have ignored this potentially feasible Alternative.
Please carefully analyze and disclose the potential benefits of
Malaria Reduction.

The World Health Organization is using insecticide-treated bed nets and combinations of existing drugs for their goal to halve the incidence of Malaria. Scientific American, June 2002

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

-

* 814 - SPIDERS AS AN INSECTICIDE ALTERNATIVE.

The Document appears to have ignored this potentially feasible Alternative.

Please carefully analyze and disclose the potential benefits of Spiders as an Insecticide Alternative.

Spiders are an excellent alternative to pesticides for agriculture, home use and golf courses. There are some 30,000 species of spiders worldwide who kill far more insects every year than insecticides do.

"According to the US Dept of Agriculture no more than 2% (and often less than 0.1%) of the insecticides applied to crops by aerial spraying or by ground spraying actually reaches the target pests; less than 5% of herbicides applied to crops reaches the target weeds."

"No more than 2% of all the insecticide sprayed on a field finds its target, but every spider gets insect meals-or it does not live to reproduce. A typical acre of meadow or woods contains an estimated 50,000 to 2 million spiders, each devouring hundreds of insects per year."

Chinese farmers build little straw huts around their field in the fall which protect hibernating spiders from the worst of the cold. American farmers have found that leaving strips of weeds around cotton and soybean fields provides habitat for insect eating Wolf spiders. In Maine the US-Deforest Service uses spiders to help control the spruce budworm. Spiders also attack the gypsy moth. G Tyler Miller, Living in the Environment, 1998 pg 618,619,624

This Alternative does not require any non-off-the shelf technology.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the

method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 815 - INTEGRATED PEST MANAGEMENT (IPM).

"IPM arose when cotton growers in the Rio Grande valley were no longer able to control insect pests with pesticides." Environmental Science; Morgan, Moran & Weirsma; W.C. Brown Pub. 1993 p 186

A 2001 General Accounting Office report found IPM failed to reduce pesticide use. While IPM is now used on more than two-thirds of U.S. crop lands, chemical pesticide use has increased.

While Integrated Pest Management can reduce pesticide use - in the US there is no example where it has lowered pesticide use by weight by more than 50% and even then it has not stopped pesticide water contamination.

"[Integrated Pest Management] alone will not eliminate the potential for contamination of ground and surface waters with pesticides." -Handbook of Integrated Pest Management for Turf and Ornamentals, edited by Anne R. Leslie, US-EPA Washington DC pg 168

"At best IPM may reduce pesticide use on a golf course by 50%, which would still result in pesticide applications 3 to 4 times greater than those made on cropfields." -Richard D. Klein, Protecting the Aquatic Environment from the Effects of Golf Courses. 1990, (updated Oct 1993) p 22, cited in USGA's 951 page "Golf Course Management and Construction"

IPM NEEDS EXTENSIVE DATA TO BE MEANINGFUL

"Integrated Pest Management" is a quantitatively meaningless term. Unless the specific pesticides to be used are disclosed; and the potential amounts of pesticides use without the proposed IPM is disclosed and the amounts used under IPM are disclosed there is no factual basis for any claim of a pesticide use reduction under IPM.

Used merely to justify itself without all needed data, IPM is as meaningless as if the Mafia claimed they will use "Integrated Robbery Management" so that only absolutely necessary robberies would occur. But if they don't tell you how many robberies they are doing now and won't let you independently monitor all the robberies they do in the future - you cannot determine whether there is any change in the number or severity of robberies.

Same thing here - if they don't tell you how much pesticide is used now and won't let you independently monitor all the pesticide use in the

future - you cannot determine whether there is any change in the number or severity of pesticide use or harm.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
Integrated Pest Management (IPM).

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure: Integrated Pest Management (IPM). using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure: Integrated Pest Management (IPM). using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Integrated Pest Management (IPM).

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures; how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary

mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: Integrated Pest Management (IPM).

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: Integrated Pest Management (IPM).

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 816 - INCREASE IN USE OF CHEMICALS OF UNKNOWN TOXICITY.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Increase in Use of Chemicals of Unknown Toxicity.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Increase in Use of Chemicals of Unknown Toxicity.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Surfactant Toxicity.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

A Federal Court wrote:
"EPA has found approximately 40 "inert ingredients" to be of toxicological concern after testing them and has determined that approximately 65 others are potentially toxic." "More than two thousand inert ingredients are used in pesticides however, and most of them have not been tested by EPA or evaluated for toxicity." NCAMP v. EPA 941 F.Supp 197, 198 (1996)

Inerts can be organic soaps and surfactants that hasten pesticide penetration through the cuticle and the stomata of leaves. The analogous surfaces in animals are the skin and the respiratory system.

Standard toxicological tests are typically evaluated without the inerts (often surfactants and organic soaps) used in commercial preparations that can alter the properties of pesticides and influence the route of exposure.
Source: Warren Porter, et al., "Endocrine, immune and behavioral effects of aldicarb (carbamate), atrazine (triazine) and nitrate (fertilizer) mixtures at groundwater concentrations," Toxicology and Industrial Health (1999) 15, 133-150. University of Wisconsin-Madison.

Approximately 1,050 of the secret ingredients are considered "inerts of unknown toxicity." EPA does not require testing to determine their toxicity. These ingredients include:

Chemicals known to be toxic (e.g., POEA or polyoxyethyleneamine, naphthalene, and zinc). POEA is present in Monsanto's glyphosate formulations Roundup and Vision. The POEA is 400 times more toxic to immature salmon than a glyphosate formulation, Rodeo, that contains no POEA. It belongs to a class of surfactants that have been reported to cause adverse gastrointestinal and central nervous system effects and damage to red blood cells. POEA is contaminated with 1,4-dioxane, a chemical that causes toxic effects in the liver and kidneys of humans and various cancers in numerous animal species.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Surfactant Toxicity.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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20b. If no margin of error is used please state that clearly.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

* 817 - SURFACTANT TOXICITY.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 818 - SURFACTANT CAUSED ECOSYSTEM AND FOOD CHAIN LOSS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Surfactant Caused Ecosystem and Food Chain loss.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Surfactants weaken water's surface tension. This harms an ecosystem by causing water striders or skimmers, water spiders, mosquito larvae and snails and leaves to sink from the surface who would otherwise float.
- "The Life of Rivers and Streams, Usinger and US-Dept of Interior 1967
Many of these species which then die because they cannot float are food for freshwater fish such as the endangered Southern Steelhead.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Surfactant Caused Ecosystem and Food Chain loss.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 819 - GROUND APPLICATION OF PESTICIDES.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Ground Application of Pesticides.

Because of the loss to "drift" aircraft apply about 30% more pesticide than ground application. (Miller, Living In The Environment, 1999 pg 624)
(See Drift)

* 820 - SWIMMING POOL CHLORINE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Swimming Pool Chlorine.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Swimming pool chlorine dumped as runoff into streams and storm drains
is not uncommon. It can harm Areas of Biological Significance (ABS) and
the Monterey Bay National Marine Sanctuary (MBNMS). The Sanctuary office Urban Water testing program has found chlorine in
its tests of the urban watersheds of Monterey and Pacific Grove.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Swimming Pool Chlorine.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 821 - COMBINED PESTICIDE AND FERTILIZER.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Combined Pesticide and Fertilizer.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

New Study Points to Inadequate Testing of Pesticides; March 26, 1999

A new study in the journal Toxicology and Industrial Health identifies significant shortcomings in toxicological testing protocols currently used to register pesticides in the United States. The five year study suggests that combinations of commonly used agricultural chemicals in concentrations that mirror levels found in groundwater can significantly influence immune and endocrine systems as well as neurological health.

"The single most important finding of the study is that common mixtures, not the standard one-chemical-at-a-time experiments, can show biological effects at current concentrations in groundwater," said Warren Porter, lead author and University of Wisconsin professor of zoology and environmental toxicology. "Although they frequently co-occur, tests for these compounds in combination are very rare."

The experiments performed by Porter's group suggest that children and the developing fetus are most at risk from pesticide-fertilizer mixtures. Their influence on developing neurological, endocrine and

immune systems, said Porter, portend change in ability to learn and in patterns of aggression.

The study focused on three commonly used farm chemicals: aldicarb, an insecticide; atrazine, an herbicide; and nitrate, a chemical fertilizer. All three are in wide use worldwide and are the most ubiquitous contaminants of groundwater in the United States.

In the series of experiments, when mice were given drinking water laced with combinations of pesticides and nitrate, they exhibited altered immune, endocrine and nervous system functions. Those changes, according to Porter, occurred at concentrations currently found in groundwater. Effects were most noticeable when a single pesticide was combined with nitrate fertilizer.

The apparent influence of pesticide and fertilizer mixtures on the endocrine system, the system of glands such as the thyroid that secrete hormones into the bloodstream, may also result in changes in the immune system and affect fetal brain development. "Thyroid disruption in humans has multiple consequences," Porter said. Some of these include effects on brain development, level of irritability, sensitivity to stimuli, ability or motivation to learn and altered immune function.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Combined Pesticide and Fertilizer.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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46. Please provide the reverse of this impact as Mitigation.

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* 822 - GOLF COURSE NITROGEN FERTILIZER USE.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
GOLF Couse Nitrogen Fertilizer Use.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

EPA's 1990 National Pesticide Survey of 1300 community water systems
estimated there are 49,300 Community Water System wells
polluted with
nitrates.

EPA's 1990 National Pesticide Survey of 1300 community water systems
estimated there are 5.9 million Rural Domestic wells polluted
with
nitrates.

Synthetic nitrogen fertilizer runoff raises levels of nutrients in water, causing excessive algae growth, which decreases oxygen available to aquatic life.

Synthetic nitrogen fertilizer runoff raises levels of nutrients in water, causing excessive algae growth, which decreases oxygen available to aquatic life. Fertilizers increase the stress on turf because their excessive nutrition increases the habitat value for pests thus increasing pesticide use.

"Mystery poison found in Carmel River"
"Health Dept warns that children, pets should stay away."
-Carmel Pine Cone Headlines Sept 19 1997
At least three dogs died from Oct 1996 to September 1997 immediately after drinking from the standing pools in the Carmel River. One attending veterinarian suspected a blue-green algae (also known as cyanobacteria), but there was no investigation. "I've been here 35 years and never seen anything like this before." said Carmel Valley veterinarian Gerald Petkus. County Health Dept Director Melton said two other dogs died after drinking water in 1996. No water samples were taken. According to Melton the algae is "very toxic to any animal" (this presumably includes humans).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
GOLF Couse Nitrogen Fertilizer Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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20b. If no margin of error is used please state that clearly.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 823 - FERTILIZER KILLING MARINE MAMMALS BY INCREASING ALGAE BLOOMS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Fertilizer killing Marine Mammals by Increasing Algae Blooms.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Nitrogen and phosphorus compounds from sewage discharges, fertilizers and some industrial wastes nourish the algae, causing their populations to explode and release poisons." WWF, 1990

"Vast blooms of Algae have emerged as the most serious effect of marine pollution." WWF, 1990

"In the summer of 1988, a slick of toxic algae more than 10 meters deep and 10 kilometers wide, spread through the Kattegat and

Skagerrak, which separate the coasts of Sweden, Norway and Denmark. More than 200 kilometers of coastline was blighted, beaches were closed, millions of fish are thought to have died; it became known as the 'Marine Chernobyl.'" WWF, 1990

"Toxic algae caused sea lion die-off" Herald headline, Jan 7(?) 1999

"Over 400 sea lions in Central Coast perished in 1998" This was due to domoic acid produced by microscopic marine organism called diatoms.
"Domoic acid is poisonous to people as well as animals." It is a poison created when a microscopic algae, Pseudo-nitzschia, multiplies rapidly in the sea. The toxin cause neurological problems, with seizures and severe depression.

"A toxin [Domoic acid] that has killed at least 25 sea lions along the Central Coast [of California] in the past couple of weeks was identified Tuesday as the same one that killed pelicans and cormorants in Monterey Bay in 1991 and dozens of sea lions in 1998." Herald, July 12, 00 pB1

During El Nino of 1997-1998 nutrient upwelling stopped as winds dropped, the undercurrent lost strength, and chlorophyll concentrations across the equatorial Pacific plummeted to their lowest recorded levels.

"During the next year, the subsequent La Nina, these trends reversed, with a vengeance." A dramatic bloom of chlorophyll ensued. Science, Dec 10 1999

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Fertilizer killing Marine Mammals by Increasing Algae Blooms.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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* 824 - GOLF COURSE NITROGEN FERTILIZER USE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Golf Course Nitrogen Fertilizer Use.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

EPA's 1990 National Pesticide Survey of 1300 community water systems estimated there are 49,300 Community Water System wells polluted with nitrates.

EPA's 1990 National Pesticide Survey of 1300 community water systems estimated there are 5.9 million Rural Domestic wells polluted with nitrates.

Synthetic nitrogen fertilizer runoff raises levels of nutrients in water, causing excessive algae growth, which decreases oxygen available to aquatic life. Fertilizers increase the stress on turf because their excessive nutrition increases the habitat value for pests thus increasing pesticide use.

Golf Course Greens receive a mean of 210 pounds of Nitrogen fertilizer per acre per year. "Greens may account for up to 10% of the area of a golf course." Golf Course Fairways receive a mean of 150 pounds of Nitrogen fertilizer per acre per year. Golf Course Tees receive a mean of 150 pounds of Nitrogen fertilizer per acre per year. - Richard D. Klein, Protecting the Aquatic Environment from the Effects of Golf Courses. Oct 1993 pg 13 citing Welterlen 1988

"Up to 84% of the nitrogen fertilizers applied to turfgrass may leach to groundwater, with the average hovering between 5% and 10%." Petrovik, A.M. 1990 The fate of nitrogenous fertilizers applied to turfgrass. Journal of Environmental Quality 19:1-14

Nitrate may pose a threat to infant when the concentration in drinking water exceeds 10 mg/l as N. Of the various studies of nitrogen leaching reviewed by Petrovik, 14% reported nitrate concentrations of 10 mg/l N or greater in leachate.

"Ideally, the amount of fertilizer applied to a golf course should equal the amount taken up by grass. Unfortunately this ideal is difficult to achieve. THE QUANTITY OF FERTILIZER ACTUALLY APPLIED TO TURFGRASS IS ALWAYS IN EXCESS OF THE PROJECTS UPTAKE." (emphasis added)
"It is assumed that a portion of the fertilizer will be lost to plants either because it washes away in surface runoff or leaches below the rooting depth of grass, which averages 18 inches." Frere, M.H., Ross, Lane 1980. The nutrient submodel. Chapter 4, In: CREAMS - A field scale model for Chemicals, Runoff, and Erosion from Agricultural Management Systems. Southeast Watershed Research Laboratory, US Dept of Agriculture, Tifton Georgia.

"Ammonium nitrate and Calcium Nitrate have a high leaching potential. But even when slow release fertilizers are used significant losses of nitrogen can occur. For example the nitrate level in groundwater beneath the Falmouth golf course on Cape Cod was 10 to 24 times greater than the background concentration even though slow-release fertilizers were used." -Richard D. Klein, Protecting the Aquatic Environment from the Effects of Golf Courses. Oct 1993 pg 14

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Golf Course Nitrogen Fertilizer Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 825 - NITRATE FERTILIZER KILLS FROGS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Nitrate Fertilizer Kills Frogs.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Fertilizer levels the US-EPA says are safe for human drinking water can kill some species of frogs and toads, according to a new study. Oregon State University researchers found some tadpoles and young frogs raised in water with low levels of nitrates typical of fertilizer runoff ate less, developed physical abnormalities, suffered paralysis and eventually died. In control tanks with normal water, none died."
Herald Jan 6 2000, pg 2

Please analyze and discuss the potential impact on the California
Red-Legged Frog (*Rana aurora draytonii*).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Nitrate Fertilizer Kills Frogs.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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* 826 - GOLF COURSE PHOSPHORUS FERTILIZER USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Golf Course Phosphorus Fertilizer Use.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Golf Course Greens receive a mean of 44 pounds of Phosphorus fertilizer per acre per year. Golf Course Fairways receive a mean of 88 pounds of Phosphorus fertilizer per acre per year. Golf Course Tees receive a mean of 93 pounds of Phosphorus fertilizer per acre per year. - Richard D. Klein, Protecting the Aquatic Environment from the Effects of Golf Courses. Oct 1993 pg 13, citing Welterlen 1988

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

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1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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* 827 - SENSOR IRRIGATED GOLF COURSE WATERING REDUCING FERTILIZER USE.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Sensor Irrigated Golf Course Watering Reducing Fertilizer Use.

Excessive irrigation of turfgrass increased nitrate-nitrogen leaching to groundwater by six-fold.
-Morton, 1988

The amount of nitrogen leached from daily-irrigated plots was 2 to 28 times greater when compared to sensor irrigated plots. Snyder (1984) compared the nitrogen losses from grass plots irrigated on a daily basis with plots irrigated only when sensors indicated watering was needed. Snyder, Augustin, Davison 1984. Moisture sensor controlled irrigation for reducing N leaching in Bermudagrass turf. Agronomy Journal 76:964-969

* 828 - GOLF COURSE PESTICIDE USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Golf Course Pesticide Use.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

New Phillipine President Joseph Estrada opposes the construction of new golf courses in the county because they hurt agricultural production.
Associated Press April 18 1999

Pesticides are used on almost all golf courses and driving ranges.
An estimated 126 pesticides are used on golf courses (Kriner, R.E. 1985.
Final Report on the results of a national survey of pesticide usage on golf courses in the U.S. AARP under a cooperative agreement with the US-EPA) including chlorothalonil, 2,4-D, and trifluralin which have caused cancer in laboratory animals. Sierra Magazine July/Aug 1993

The twenty most heavily used golf course pesticides in the US in 1982 (and their use in thousands of pounds of active ingredient) were:
Chlorothalonil (1,298), MCPP mecoprop (1,096), MSMA (834), Iprodione (815), Thiram (635), Diazinon (512), Benoyml (500), Paraffin oil (487), Dimethylamine 2,4-D (462), Pentachlorophenol (456), EDB - ethylene dibromide (402), DCPA (400), Maneb (376), Isofenphos (374), Dicamba (297), Mancozeb (218), Trichlorfon (215), Bensulide (210), Aromatic petroleum derivative / solvent (190), Xylene / solvent (152). USGA's 1993 book "Golf Course Management and Construction" pg 228

Two of the most common families of pesticides are organophosphates and carbamates. These classes of chemicals account for a large percentage of the pesticides used on golf courses and "their immediate physiological effects on arthropods can be quantified." "Organophosphates and carbamates exert their toxicity by suppressing the production of the cholinesterase enzymes necessary for the breakdown of the neurotransmitter acetylcholine and the normal functioning of the peripheral and central nervous systems." Li, Q. Sakuda, K. Harada, R. and Guo, F. Analysis of WaterSamples for Low Levels of Pesticides and Analysis of Inhibition of Neurotransmitter Breakdown in Insects. Dept. of Env. Biochem. University of Hawaii 1998.

Other typical poisons used on golf courses include Phosphorus, Mercury, Arsenic, Nemaacur (phenamiphos).

EPA's National Pesticide Survey of 1300 community water systems estimated the numbers of community Rural domestic wells poisoned with specific pesticides included (number of wells): DCPA acid metabolites (264,000), Atrazine (70,800), DBCP (38,400), Simazine (25,100), Prometon (25,600), Ethylene dibromide (19,200), Lindane (13,000), Ethylene thiourea (8,470), Bentazon (7,160), Alachlor (3,140).

EPA's National Pesticide Survey of 1300 community water systems estimated the numbers of community water system wells poisoned with specific pesticides included (number of wells): DCPA acid metabolites

(6,010), Atrazine (1570), Simazine (1,080), Prometon (520), Hexachlorobenzene (470), DBCP (370), Dinoseb (25).

LOCAL GOLF COURSE PESTICIDE USE

! Some Monterey Peninsula Golf Courses use thousands of pounds of pesticides on golf courses every year.

"750 kilograms (about 1650 pounds) of pesticides are sprayed on a typical golf course annually, and average of 11 kilograms per hectare (about 10 pounds per acre)." -Toxic Green, Worldwatch May/June 1994 pg 27 This is roughly six (6) to eight (8) times higher pesticide concentration than that used on agricultural crops.

HUMAN PESTICIDE POISONINGS

! Pesticides are designed and applied to kill. Some 428 cases of human pesticide poisoning were reported to public officials in Monterey County during a six year period. Fifty 50 cases of human pesticide poisoning were reported in Monterey County in 1996.

In 1983 a healthy 30 year old US Navy flight officer died of a violent allergic reaction ("basketball size blisters") to Chlorothalonil (Daconil 2787) after playing golf. Sierra Magazine July/Aug 1993; TD p 6

LEGAL DISCLOSURE

The Calif Supreme Court noted, in Laurel Heights v Regents of University of California 1988, that while a scientific facility need not set forth all the potentially dangerous chemicals it could use because that would require prescience and unreasonably shackle scientific imagination "a manufacturing facility could reasonably be expected to know or estimate what materials it intends to use in its operations."

It is completely reasonable to expect that a golf course proposed to be located in the middle of NINETEEN OTHER GOLF COURSES can predict with a small margin of error WHICH PESTICIDES it could use AND HOW MUCH OF THEM.

! Pesticides concentrate in runoff from rains.
A study of 87 golf courses by the Attorney General of New York State found 6 of the most common pesticides "are known to be capable of contaminating groundwater after normal applications following label directions." These six pesticides are: chlorothalonil, dacthal, dicamba, 2,4-D, prometon and trifluralin.

Diazanion is the second most commonly detected pesticide detected in California surface waters. ("Disrupting the Balance", 1999 CPR)

That NY Attorney General report also found some soils are a very poor barrier to pesticide migration. Two pesticides (chlorothalonil and Dacthal) are rated "as having a 'small' leaching potential have nevertheless reached Long Island's groundwater."

"Putting greens are more susceptible to chemical leaching than fairways or roughs because beneath that thin layer of turf is a base of 70 to 90

percent sand. Chemicals sometimes leach through the sand, especially after heavy rainfalls. if those chemicals migrate into a stream filled with brook trout, which have a low tolerance for pollution, the fish may die." Sierra Magazine July/Aug 1993

PESTICIDE MIGRATION

According to Dr. Stuart Cohen (an advocate for golf course developers as President of Environmental & Turf Services) sometimes pesticides degrade to something more toxic; that he knows "of no way to seal an entire golf course"; "that as much as 15% of pesticides could leave a golf course"; Comments on Rancho San Carlos EIR 1997.

Expert opinion from the University of California at Santa Cruz noted in their comments on the Rancho San Carlos Draft EIR included in the RSC FEIR VOL 1 page B-216: "The effects of pesticides alone can cause significant groundwater and surface water contamination, fishery losses, and losses of birds and other wildlife (Pimentel, et al. 1992)."

Expert Opinion from a man employed as water Quality Biologist for the California Department of Fish and Game states: "In my opinion it will be expensive and difficult to rectify the situation once pesticides or nitrates are found in the drinking water or streams."

! No one is required to test Watercourses for Pesticides In 1995 Monterey County Health Department tried to trivialize golf course pesticide impacts to the Carmel River by saying "we've never found any pesticides in the Carmel River."

This is professional misconduct and massive negligence because Monterey County "Health" department admits they have NOT tested the watercourses adjacent to golf courses including the Carmel River or any stream in Pebble Beach for each pesticide.

Worse - Monterey County "Health" admits they don't even keep a list of pesticides used on golf courses built before 1997 and they don't track liquid or solid poison use of less than 100 pounds.

! Pesticides kill, injure and weaken wildlife. Browsing Carmel Valley's Quail Lodge Golf Course pesticide use forms at the County Agriculture Department we find hundreds of pounds of Copper Sulphate and Miles-Nemacur and thousands of pounds of other chemicals without cross references. For context - Quail Lodge golf course is right next to the Carmel River and just upstream of pumps for our Peninsula drinking water and the place where the Red-Legged Frog tadpoles were found.

California Department of Fish and Game notes Copper Sulphate is "Highly Toxic to Fish, ESPECIALLY TROUT AND SALMON" and Nemacur (aka Fenamiphos) is "EXTREMELY TOXIC TO FISH and wildlife [emphasis added]."

! Killing or injuring wildlife is an obvious environmental impact.

! Killing or injuring a single individual of a species listed under the ESA is illegal and a mandatory significant environmental impact under CEQA Guidelines Section 15065.

! Harming the habitat of a species listed under the ESA is illegal and a significant environmental impact under CEQA Guidelines Section 15065.

The degradation of the stream water quality due to the chemical cocktail in pesticides causes a loss of habitat for fish and amphibians. This loss of habitat is a reduction in the range of the California red-legged frog and Steelhead and must be identified as a significant environmental impact.

! Chemicals have different toxicities. There is no such thing as a "representative" pesticide to test for.

EACH PESTICIDE MUST BE TESTED FOR DETECTION SEPARATELY! According to a Monterey Peninsula College chemistry professor (Gordon Williams) and a former forensic chemist for the Los Angeles Police Department - there is no single test for "pesticides." Each pesticide must be tested for detection individually.

Chemicals have Different Toxicities Without knowing the specific pesticide names and chemical components and quantities to be used - no one, including experts, can make any reliable conclusions regarding their impacts. If an expert could make reliable conclusions regarding pesticide impacts - without knowing the specific pesticide and chemical names or quantities, there would be no need for data on different pesticides and all MSDS sheets would be identical.

ALL Pesticides and their chemical constituents must be disclosed. The toxicity of each chemical constituent must be disclosed.

! Increasing Carmel River pumping increases the river dewatering and concentrates the existing pesticides in the river.

! Please estimate (considering Laurel Heights) the proposed yearly amounts of use (in pounds) of each pesticide product.

! Please describe the toxicity limits to humans and wildlife for each product AND chemical described above in terms of Carcinogenic, hazardous, poisonous, and lethal doses including the LD and LC.

! Please describe the half life of each chemical so we can get a ballpark idea of the persistence of the chemical in the environment.

! If there are no studies of toxicity or persistence for a specific chemical - please explicitly note that.

! Please include an Material Data Safety Sheet (MSDS) for each chemical to be applied to the Golf Course, just as required for every chemical used in a school laboratory.

! Please list and describe all products and all (including so called "inert" components) their chemical constituents (Brand name and chemical name) to be applied to the proposed golf turf.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Golf Course Pesticide Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 829 - FERTILIZER REDUCTION REDUCING PESTICIDE NEED.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Fertilizer Reduction Reducing Pesticide Need.

Fertilizers increase the stress on turf because their excessive nutrition increases the habitat value for pests thus increasing pesticide use. If fertilizers are only used during the growing season, and only as much fertilizer is used as the turf needs - pesticide use can be cut back significantly.

* 830 - GOLF COURSE INTEGRATED PEST MANAGEMENT (IPM).

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Golf Course Integrated Pest Management (IPM).

"At best IPM may reduce pesticide use on a golf course by 50%, which would still result in pesticide applications 3 to 4 times greater than those made on cropfields."
-Richard D. Klein, Protecting the Aquatic Environment from the Effects of Golf Courses. 1990, (updated Oct 1993) p 22, cited in USGA's 951 page "Golf Course Management and Construction"

"[Integrated Pest Management] alone will not eliminate the potential for contamination of ground and surface waters with pesticides."
-Handbook of Integrated Pest Management for Turf and Ornamentals, edited by Anne R. Leslie, US-EPA Washington DC pg 168

"Integrated Pest Management" is a quantitatively meaningless term. Unless the specific pesticides to be used are disclosed; and the potential amounts of pesticides use without the proposed IPM is disclosed and the amounts used under IPM are disclosed there is no factual basis for any claim of a pesticide use reduction under IPM.

* 831 - GRANULAR PESTICIDES VS LIQUID.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Granular Pesticides vs Liquid.

Agronomists find that changing the pesticide from a liquid to a granular form can reduce the amount of pesticide needed by 90 percent in weight.

* 832 - PESTICIDE FREE GOLF COURSE.

Several golf courses are pesticide free. Those include the San Francisco Presidio's National Park Service Golf Course managed by Arnold Palmer Golf Management starting in 1996; "The Resort" at Squaw Creek near Lake Tahoe in California's Sierras has not used pesticides since 1991; and Colorado's Applewood Golf Course owned by the Coors Brewing Company which has not used any pesticides since 1989. Coors was concerned because the water for their beer comes from the aquifer directly below the course.

If pesticides will not be used please describe how their non-use will be permanently prohibited and enforced.

This Alternative does not require any non-off-the shelf technology.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits

of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number;

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF

Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this

alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION

K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS

L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS

Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 833 - GOLF COURSE CHEMICAL USE OTHER THAN FERTILIZERS AND PESTICIDES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Golf Course Chemical use other than Fertilizers and Pesticides.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Hydrogen Peroxide is commonly used to prepare soil for a golf course. (World Watch May/June 1994) Please describe whether Hydrogen Peroxide will be used to prepare the ground, if so how much will be used and if not how its use will be prohibited and enforced.

What other chemicals will be used?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Golf Course Chemical use other than Fertilizers and Pesticides.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 834 - CHEMICAL USE DURING GOLF COURSE PREPARATION AND CONSTRUCTION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of

Chemical use during Golf Course Preparation and Construction.

If you claim the document contains proof of no-significant impact for this impact please explicitly state the page number and paragraph.

Hydrogen Peroxide is commonly used to prepare soil for a golf course.
(World Watch May/June 1994) Please describe whether Hydrogen Peroxide will be used to prepare the ground, if so how much will be used and if not how its use will be prohibited and enforced.

What other chemicals will be used?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Chemical use during Golf Course Preparation and Construction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 835 - GOLF COURSE FERTILIZER STARTUP USE.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Golf Course Fertilizer Startup use.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Golf Course Fertilizer Startup use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 836 - GOLF COURSE PESTICIDE STARTUP USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Golf Course Pesticide Startup use.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Golf Course Pesticide Startup use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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35. Please list, describe and quantify all Indirect impacts related to this one.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 837 - GOLF COURSE FERTILIZER RUNOFF.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Golf Course Fertilizer Runoff.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Golf Course Fertilizer Runoff.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 838 - GOLF COURSE PESTICIDE RUNOFF.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Golf Course Pesticide Runoff.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Golf Course Pesticide Runoff.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 839 - PROFESSIONAL LANDSCAPING PESTICIDE USE.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Professional Landscaping Pesticide Use.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Professional Landscaping Pesticide Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 840 - NON-PROFESSIONAL HOME LANDSCAPING PESTICIDE USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of

Non-Professional Home Landscaping Pesticide Use.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Consumers can still buy and use pesticides no longer available to professionals, because those pesticides are exceedingly deadly and high risk.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Non-Professional Home Landscaping Pesticide Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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12. Please state the most extreme values which could be encountered.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 841 - REQUIRE PERMITS FOR HOME PESTICIDE USE.**

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of
Require Permits for Home Pesticide Use.

Counties or cities can require permits for home pesticide use because of the health and safety risk. In jurisdictions where this is in place the consumer fills out a form with the product name, amount and location for its use. Some areas require notification of all neighbors within 100 yards of all property lines.

*** 842 - HAZARDOUS MATERIALS USE.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Hazardous Materials Use.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Hazardous Materials Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 843 - HAZARDOUS MATERIALS HANDLING.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Hazardous Materials Handling.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Hazardous Materials Handling.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 844 - HAZARDOUS MATERIALS STORAGE.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Hazardous Materials Storage.
- If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
- Please state the maximum quantity of the hazardous material that would be stored at any one time.
- Please analyze a worst case spill of each material.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Hazardous Materials Storage.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
- 30 Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.
34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 845 - GENUINELY HAZARDOUS - BUT NOT DEFINED AS SUCH - WASTES.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Genuinely Hazardous - but not defined as such - Wastes.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- "EPA estimates 6 Billion tons (with a "B") of hazardous waste are produced every year in the US. But because only about six percent (6%) is legally defined as hazardous waste - ninety four percent (94%) of the country's hazardous waste is not regulated by hazardous waste laws."
- Several materials are omitted from Congress' definition of Hazardous
- Wastes but are clearly hazardous and probably deadly. Those include -
- 1) radioactive wastes,
 - 2) hazardous and toxic materials discarded by households,
 - 3) mining wastes,
 - 4) oil and gas drilling wastes (routinely discharged into surface waters,
 - 5) liquid waste containing in organic hydrocarbons (80% of all liquid hazardous wastes),
 - 6) cement kiln dust produced when liquid hazardous wastes are burned in a cement kiln (a practice classified as recycling by the US-EPA but considered dangerous sham recycling by environmentalists, and
 - 7) wastes from the thousands of small businesses and factories that generate less than 100 kilograms (220 pounds) of hazardous waste per month.
- (G Tyler Miller, Living in the Environment, 1998 pg 566
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Genuinely Hazardous - but not defined as such - Wastes.
- 1b. If no objective criteria are used please state that clearly.
2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 846 - PESTICIDE IMPACTS ON LISTED SPECIES.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Pesticide Impacts on Listed Species.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Fish and amphibians are especially harmed by pesticides in surface waters. The California Red-Legged Frog (*Rana aurora draytonii*) and the West Coast Steelhead (*Oncorhynchus mykiss*, or *O. mykiss*) are formally protected under the Endangered Species Act. Both species are particularly harmed by pesticide impacts. The fish because it "breathes" river water in which pesticides can occur; and the frog because its entire skin must be kept constantly wet and it absorbs pesticides through its skin.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of

Pesticide Impacts on Listed Species.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 847 - PESTICIDE BIOACCUMULATION IMPACTS ON HUMANS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Pesticide Bioaccumulation Impacts on Humans.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

Bioaccumulation is the uptake and retention of chemicals in a single living organism via food, air or water consumption or contact. For some chemicals (e.g., pesticides, mercury) even extremely low concentrations in water or sediments have the potential to bioaccumulate in fish tissue to concentrations high enough to pose health risks to fish consumers.

In 1996 2,193 fish consumption advisories were issued in 48 states. Mercury, PCBs, chlordane, dioxin and DDT were responsible for almost all fish consumption advisories in 1996. -EPA Administrator, Carol Browner and Secretary, Dept of Agriculture Dan Glickman Feb 14th 1998 in Report called the "Clean Water Action Plan" to Vice President Al Gore. "Predatory organisms at the top of the food web generally have higher mercury concentrations." Mercury Study Report to Congress Dec 1997

According to Mark Miller, M.D. MPH a member of the Environmental Health Committee of the American Academy of Pediatrics (quoted in Coast Weekly April 22 1999) - even low level exposure to Organophosphorus pesticide compounds (e.g. diazinon, cypermethrin, Chlorpyrifos, hydramethlynon, propetamphos and Malathion) may cause symptoms. "The effects of organophosphates are cumulative so that if the chemical used in the home and in food is added to those used on school grounds, something may tip the bucket."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Pesticide Bioaccumulation Impacts on Humans.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 848 - PESTICIDE BIOACCUMULATION HARM TO LISTED SPECIES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Pesticide Bioaccumulation Harm to Listed Species.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Bioaccumulation is the uptake and retention of chemicals in a single
living organism via food, air or water consumption or contact.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Pesticide Bioaccumulation Harm to Listed Species.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 849 - PESTICIDE BIOMAGNIFICATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Pesticide BioMagnification.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Biomagnification is how Bioaccumulation increases through a food chain.

"As PCBs work their way up the food chain, their concentrations in animal tissue can be magnified up to 25 million times."
"Our Stolen Future, 1999 citing R. Norstrom., D. Hallett, and R. Sonstegard 'Coho Salmon and Herring Gulls as Indicators of Organochlorine Contamination in Lake Ontario,' Journal of the Fisheries Research Board of Canada 35(11):1401-1409 (1978)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pesticide BioMagnification.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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12. Please state the most extreme values which could be encountered.

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18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 850 - PESTICIDE IMPACTS ON CALIFORNIA RED-LEGGED FROGS.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Pesticide impacts on California Red-Legged Frogs.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Pesticide impacts on California Red-Legged Frogs.

1b. If no objective criteria are used please state that clearly.

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3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 851 - PESTICIDE IMPACTS ON CALIFORNIA RED-LEGGED FROG HABITAT.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Pesticide impacts on California Red-Legged Frog Habitat.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Pesticide impacts on California Red-Legged Frog Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 852 - PESTICIDE IMPACTS ON THE WEST COAST STEELHEAD.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Pesticide impacts on the West Coast Steelhead.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pesticide impacts on the West Coast Steelhead.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 853 - PESTICIDE IMPACTS ON THE WEST COAST STEELHEAD HABITAT.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Pesticide impacts on the West Coast Steelhead Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Pesticides can cause the loss of populations of food which the steelhead depend upon.

QUANTIFICATION OF BASELINES AND IMPACTS:

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 854 - ENDOCRINE DISRUPTOR CHEMICALS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Endocrine Disruptor Chemicals.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Known Endocrine Disruptor chemicals include Organochlorines (e.g. DDT and its degradation products), PCBs, Alkylphenol Ethoxylates (APEs), Phthalates, Nonylphenols, Bisphenol-A, Phytoestrogens, DEHP, dicofol, HCB, kelthane, kepone, lindane, methoxychlor, octachlorostyrene, synthetic pyrethroids, triazine herbicides, EBDC fungicides, cadmium, lead, mercury, tributlin, alkyl phenols. OSF pg 217, 253

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Endocrine Disruptor Chemicals.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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* 855 - CARCINOGENS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Carcinogens.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"When carcinogens are deliberately or accidentally introduced into the environment, some number of vulnerable persons are consigned to death. The impossibility of tabulating an exact body count does not alter this fact."

Please list ALL potential and known Carcinogens which could potentially be used in the project or its construction or operations or maintenance.

Please list ALL potential and known carcinogens currently on or affecting the project site.

Use California's Proposition 65 list of known carcinogens, California EPA's list, the US-EPA's list of carcinogens, and the US-Coast Guard's list.

Listed Carcinogens include Diesel engine exhaust (creating 3-Nitrobenzanthrone the most carcinogenic material known), lead, urethane (insulation), benzene (most hydrocarbon fuels), arsenic, asbestos, ceramic fibers (roof insulation), pentachlorophenol (telephone poles).

Please list all quantities of each of the carcinogens to be used in any phase of the project from construction to operations and maintenance.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Carcinogens.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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-

* 856 - LEAD.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Lead.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Lead is a Cumulative Poison (Sax's Properties of Dangerous Materials)

Lead causes Irreversible Damage (263 J. American Medical Assoc 790-91)

Lead is the Most toxic of ATSDR's "20 most hazardous toxics"

Lead Accumulates in bones and soft tissue.

Lead Can only be cleaned from soft tissue, not from bones. (86 Pediatrics 455-57, 1990; 144 Am J. Dis Child 1039-44, 1990)

Lead does not appear at all in the healthy human body.

Center for Disease Control (CDC) recently (circa 1991) reduced the level of toxicity for lead in human blood, to 10 mg/L.

In 1985, CDC concluded that blood levels above 25 mg/l were toxic. In 1984, CDC estimated that 3 to 4 million children under age 6 suffered from serious blood lead levels.

Known human Lead caused damage begins at blood levels of about 5 mg/l (or 5 micrograms per deciLiter) where Developmental Toxicity is measured including loss of IQ, Hearing and Growth deficiencies (height, weight and chest circumference).

May 2000 Dr. Bruce Lanphear reported a study showing cognitive impairment in children with blood levels as low as 2.5 mg/L. Lanphear estimated some 12.8 million youngsters born between 1988 and 1994 have blood levels in excess of 2.5 mg/L. AP 4/16/00

Fatalities occur when blood lead levels reach 80 mg/l (called "acute lead encephalopathy"). 24 Clinical Pediatrics 280-85, 1985

Blood lead levels of 25-45 mg/l have resulted in children losing 4 to 5 IQ points. (79 Pediatrics 457-65, 1987)

LEAD PAINT

"The risk presented by leaded paint is severe. A one gram paint chip containing 5 percent lead could deliver a potentially fatal dose."

"Lead absorption is increased in children with iron deficiencies, digestive problems, and those suffering from malnutrition." "Exterior lead-based paint pigments were not restricted by the US

Consumer Product safety Comm. until 1977." (Defending Lead Poisoning Claims, "For the Defense" April 1992)

Many

ATSDR - ToxFAQs - Lead

ToxFAQs Lead April 1993

Agency for Toxic Substances and Disease Registry

This fact sheet answers the most frequently asked health questions about lead. For more information, you may call 404-639-6000. This fact sheet is one in a series of summaries about hazardous substances and their health effects. This information is important because this substance may harm you. The effects of exposure to any hazardous substance depend on the dose, the duration, how you are exposed, personal traits and habits, and whether other chemicals are present.

SUMMARY: Exposure to lead happens mostly from breathing workplace air or dust, and eating contaminated foods. Children can be exposed from eating lead-based paint chips, or playing in contaminated soil. Lead can damage the nervous system, kidneys, and the immune systems. Lead has been found in at least 922 of 1,300 National Priorities List sites identified by the Environmental Protection Agency.

What is lead? (Pronounced led)

Lead is a naturally occurring bluish-gray metal found in small amounts in the earth's crust. It has no special taste or smell. Lead can be found in all parts of our environment. Most of it came from human activities like mining, manufacturing, and the burning of fossil fuels.

Lead has many different uses, most importantly in the production of batteries. Lead is also in ammunition, metal products (solder and pipes), roofing, and devices to shield x-rays.

Because of health concerns, lead from gasoline, paints and ceramic products, caulking, and pipe solder has been dramatically reduced in recent years.

What happens to lead when it enters the environment?

Lead itself does not break down, but lead compounds are changed by sunlight, air, and water. When released to the air from industry or burning of fossil fuels or waste, it stays in air about 10 days.

Most of the lead in soil comes from particles falling out of the air.

City soils also contain lead from landfills and leaded paint.

Lead sticks to soil particles.

It does not move from soil to underground water or drinking water unless the water is acidic or "soft".

It stays a long time in both soil and water.

How might I be exposed to lead?

Breathing workplace air (lead smelting, refining, and manufacturing industries)

Eating lead-based paint chips

Drinking water that comes from lead pipes or lead soldered fittings

Breathing or ingesting contaminated soil, dust, air, or water near waste sites

Breathing tobacco smoke

Eating contaminated food grown on soil containing lead or food covered with lead-containing dust

Breathing fumes or ingesting lead from hobbies that use lead (leaded-glass, ceramics)

How can lead affect my health?

Lead can affect almost every organ and system in your body. The most sensitive is the central nervous system, particularly in children. Lead also damages kidneys and the immune system. The effects are the same whether it is breathed or swallowed.

Exposure to lead is more dangerous for young and unborn children. Unborn children can be exposed to lead through their mothers. Harmful effects include premature births, smaller babies, decreased mental ability in the infant, learning difficulties, and reduced growth in young children. These effects are more common after exposure to high levels of lead.

In adults, lead may decrease reaction time, cause weakness in fingers, wrists, or ankles, and possibly affect the memory. Lead may cause anemia, a disorder of the blood. It can cause abortion and damage the male reproductive system. The connection between these effects and exposure to low levels of lead is uncertain.

How likely is lead to cause cancer?

The Department of Health and Human Services (DHHS) has determined that lead acetate and lead phosphate may reasonably be anticipated to be carcinogens based on studies in animals. There is inadequate evidence to clearly determine lead's carcinogenicity in humans.

Is there a medical test to show whether I've been exposed to lead?

A blood test is available to measure the amount of lead in your blood and

to estimate the amount of your exposure to lead. Blood tests are commonly used to screen children for potential chronic lead poisoning. The Centers for Disease Control and Prevention (CDC) considers children to have an elevated level of lead if the amount in the blood is at least 10 micrograms per deciliter (10 g/dL). Lead in teeth and bones can be measured with X-rays, but this test is not as readily available.

Has the federal government made recommendations to protect human health?

The Centers for Disease Control and Prevention (CDC) recommends all children be screened for lead poisoning at least once a year. This is especially important for children between 6 months and 6 years old.

The Environmental Protection Agency (EPA) requires lead in air not to exceed 1.5 micrograms per cubic meter (1.5 ug/m³) averaged over 3 months. The sale of leaded gasoline is illegal as of December 31, 1995. EPA limits lead in drinking water to 15 micrograms per liter (15 ug/L).

The Consumer Product Safety Commission (CPSC), EPA, and the states control the levels of lead in drinking water coolers. Water coolers that release lead must be recalled or repaired. New coolers must be lead-free. Drinking water in schools must be tested for lead.

The Department of Housing and Urban Development (HUD) requires that federally funded housing and renovations, public housing, and Indian housing be tested for lead-based paint hazards. Hazards must be fixed by covering the paint or removing it.

The Occupational Safety and Health Administration (OSHA) limits the concentration of lead in workroom air to 50 ug/cubic meter for an 8-hour workday. If a worker has a blood lead level of 40 ug/dL, OSHA requires that worker to be removed from the workroom.

Glossary

Carcinogenicity:
Ability to cause cancer.
Anemia:
Low numbers of red blood cells or hemoglobin.
Ingesting:
Taking food or drink into your body.
Microgram (ug):
One millionth of a gram.

References

Agency for Toxic Substances and Disease Registry (ATSDR). 1993. Toxicological profile for lead. Atlanta: U.S. Department of Health and Human Services, Public Health Service.

Agency for Toxic Substances and Disease Registry (ATSDR). 1993. Case studies in environmental medicine: Lead toxicity. Atlanta: U.S. Department of Health and Human Services, Public Health Service.

Where can I get more information?

ATSDR can tell you where to find occupational and environmental health clinics. Their specialists can recognize, evaluate, and treat illnesses resulting from exposure to hazardous substances. You can also contact your community or state health or environmental quality department if you have any more questions or concerns. For more information, contact:

Agency for Toxic Substances and Disease Registry
Division of Toxicology
1600 Clifton Road NE, Mailstop E-29
Atlanta, GA 30333
Phone: 404-639-6000

U.S. Department of Health and Human Services Public Health Service
Agency for Toxic Substances and Disease Registry

Charlie Xintaras / chx1@cdc.gov
<http://atsdr1.atsdr.cdc.gov:8080/tfacts13.html>

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Lead.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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*** 857 - LOW STREAMFLOW CAUSING POPULATION DECLINE BY PREDATION INCREASE.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Low Streamflow Causing Population Decline by Predation Increase.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Overpumping a stream can reduce it to pools connected only by dry riverbed. This reduces or eliminates the capability of a fish to escape land based predators including humans.

SWRCB Memorandum Nov 1999 in File 262.0(27-08-01) -
"[W]hen the fish are confined to pools such as this, the opportunity for predation is significantly higher than during periods of continuous flow..." (pg 7)

"[L]ow [streamflow] flow periods are times when aquatic organisms are most susceptible to predation. Although the stream habitat may exhibit the capability to support large numbers of fish at a relatively low flow, there are significant population declines among aquatic organisms during

these periods because the aquatic habitat is more accessible to land and avian predators." (pg 10)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Low Streamflow Causing Population Decline by Predation Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 858 - AQUATIC AND RIPARIAN HABITAT DEWATERING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Aquatic and Riparian Habitat Dewatering.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Overpumping a river or other water body, whether by surface or groundwater extraction can dewater habitat and cause the death of aquatic species.

ESA Listed Steelhead Take:

US-National Marine Fisheries Service, SW Region letter Nov 6 1991 New
Los Padres Dam Draft EIR comments:

"Excessive drawdown of [the Carmel Valley and Seaside] aquifers results in a dry lower Carmel River, such that river flow does not reach the sea, preventing steelhead migration." "As the populations and water demand grow, mandatory water rationing and water shortages during droughts will be more severe, and fisheries impacts could worsen."

"We are not sure whether either the CDFG instream flow recommendations or the MPWMD flow recommendations are appropriate to adequately restore the steelhead run."

During the 1987 to 1995 time period the steelhead trout run in the Carmel River dropped. It fell to ZERO for four years at the beginning of that decade. Only single digit numbers of the species showed up for 6 of the last 10 years. This, among other things, caused the steelhead to be federally listed and protected under the Endangered Species Act in 1997.

The California Red-legged Frog was also recently ESA listed (1996) by

the US-Fish & Wildlife Service. The headwaters of the Carmel River host one of the three "largest" (really meaning non-tiny) remaining populations of the frog.

ESA Listed Steelhead Take:

US-National Marine Fisheries Service, SW Region letter Oct 10 1997:

"...Water District Senior Fisheries Biologist Dave Dettman counted 289 dead juvenile steelhead in the Robinson Canyon to Shulte Road reach of the Carmel River. Mr. Dettman observed that the cause of the fish kill was due to no, or minimal flows, and high water temperatures. The fish kill was attributed to pumping rates at Cal-Am wells in excess of Stream flows, and recharge capacity. If these allegations are true, Cal-Am's practices could be significantly affecting a fish species that NMFS has listed for protection under the ESA."

"WR 95-10 Conditions are inadequate in light of the subsequent ESA listing for steelhead and designation of critical habitat and because steelhead are continuing to be taken every year due to the overpumping."

Comments by Steve Edmondson, Team Leader, Fishery Biologist in the Northern California Habitat Conservation Division of the United States Department of Commerce, National Marine Fisheries Service (NMFS) in testimony to California Water Resources Control Board May 30, 2000 in Monterey, CA. Carmel River Steelhead Population Importance:

US-National Marine Fisheries Service, SW Region letter May 20 1996

"...given the importance of the Carmel River Steelhead population for recovery of steelhead coastwide,..."

ESA Listed Frog Take:

US-FWS letter Dec 10 1997:

"Existing water diversions along the Carmel River may be resulting in the take of the threatened The California Red-Legged Frog (*Rana aurora draytonii*)."

"The Service is concerned that water diversions along the Carmel River may be resulting in the take of the threatened California Red-Legged Frog."

ESA Listed Frog Take:

US-FWS letter July 20 1997 to the SWRCB Chairman:

Titled "Potential Endangered Species Act Violation for the California Red-Legged Frog from Water Diversions on the Carmel River, Monterey County, California."

ESA Listed Species Predation:

Overpumping a stream can reduce it to pools connected only by dry

riverbed. This reduces or eliminates the capability of a fish to escape land based predators including humans.

SWRCB Memorandum Nov 1999 in File 262.0(27-08-01) -

"[W]hen the fish are confined to pools such as this, the opportunity for predation is significantly higher than during periods of continuous flow..." (pg 7)

"[L]ow [streamflow] flow periods are times when aquatic organisms are most susceptible to predation. Although the stream habitat may exhibit the capability to support large umbers of fish at a relatively low flow, there are significant population declines among aquatic organisms during these periods because the aquatic habitat is more accessible to land and avian predators." (pg 10)

We feel that sufficient flow for the river must be maintained so that the species are not harmed by dewatering.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Aquatic and Riparian Habitat Dewatering.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 859 - SURFACE WATER OVERPUMPING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Surface Water Overpumping.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

US-National Marine Fisheries Service, SW Region letter Nov 6 1991
New Los Padres Dam Draft EIR comments:
"Excessive drawdown of [the Carmel Valley and Seaside] aquifers results in a dry lower Carmel River, such that river flow does not reach the sea, preventing steelhead migration." "As the populations and water demand grow, mandatory water rationing and water shortages during droughts will be more severe, and fisheries impacts could worsen."

"We are not sure whether either the CDFG instream flow recommendations or the MPWMD flow recommendations are appropriate to adequately restore the steelhead run."

Steelhead Take:
US-National Marine Fisheries Service, SW Region letter Oct 10 1997
"...Water District Senior Fisheries Biologist Dave Dettman counted

289 dead juvenile steelhead in the Robinson Canyon to Shulte Road reach of the Carmel River. Mr. Dettman observed that the cause of the fish kill was due to no, or minimal flows, and high water temperatures. The fish kill was attributed to pumping rates at Cal-Am wells in excess of Stream flows, and recharge capacity. If these allegations are true, Cal-Am's practices could be significantly affecting a fish species that NMFS has listed for protection under the ESA."

US-FWS letter Dec 10 1997
"Existing water diversions along the Carmel River may be resulting in the take of the threatened The California Red-Legged Frog (Rana aurora draytonii)."

"The Service is concerned that water diversions along the Carmel River may be resulting in the take of the threatened California Red-Legged Frog."

Please use criteria which compare surface daily water flows with and without existing and proposed pumping.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Surface Water Overpumping.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 860 - GROUNDWATER WATER TABLE LOWERING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Groundwater Water Table Lowering.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Water Tables around the world are falling at an average rate of three meters (9.8 feet) a year. The Earth's annual water deficit is at 160 billion cubic meters.
-Worldwatch book: Pillar of Sand: Can the Irrigation Miracle last?

"Tapping groundwater consumes liquid capital."
The Ogallala aquifer, underlying eight US Great Plains states is being depleted to such a degree that water tables are falling up to a meter a year. A quarter of all US irrigated cropland is onyl kept watered at the cost of depleting groundwater supplies, and some areas have already been abandoned. WWF, 1990

Please use criteria which compare water table levels with and without existing and proposed pumping.

We recommend that an absolute critical threshold of significance is reached when more water is pumped than is refilled by direct and indirect recharge. Any additional water pumping, no matter how small, is a significant impact when the Water table is permanently descending.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Groundwater Water Table Lowering.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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34. Please list, describe and quantify all Growth impacts related to this one.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 861 - LOCAL GROUNDWATER OVERDRAFTING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Local Groundwater Overdrafting.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Overdraft" is the difference between the amount of water being drawn
from the ground and nature's ability to replenish the supply.

Lowering the water table can cause water stoppages for neighbors and
can cause the deaths of local trees and plants and the animals and
ecosystems that depend on them.

The groundwater level in the "East Zones" of the Salinas Valley has
dropped more than 70 feet and continues to drop.

Please use criteria which compare water table levels with
and without
existing and proposed pumping.

Please use criteria which measure water pumping rates over
the course
of one month during the driest part of the year - August.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the
objective
(non-subjective) CRITERIA used to determine the impact
significance of
Local Groundwater Overdrafting.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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-

* 862 - OVERPUMPING AN AQUIFER.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Overpumping an Aquifer.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Overpumping an Aquifer affects a much larger area than Local Groundwater
Overdrafting and a normally a smaller area than Overpumping a Watershed.
Overpumping an Aquifer is a systemic problem generally involving many
pumps over a wide area.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Overpumping an Aquifer.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 863 - OVERPUMPING A WATERSHED.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Overpumping a Watershed.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Overpumping a Watershed.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30. Please describe all potential CUMULATIVE impacts related to this one.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 864 - PUMPING THE LAST ACRE FOOT OF WATER FROM THE CARMEL RIVER AQUIFER.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Pumping the Last Acre Foot of Water from the Carmel River Aquifer.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The Carmel River Aquifer has never been pumped dry, yet. However the wells once were sucking air when there was theoretically 10,000 acre feet of water remaining. Personal communication with MPWMD Manager Darby Feurst, June 1998

How do we know the actual capacity of the Carmel River Aquifer?

How do we know when we have pumped all the water practical out of it?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pumping the Last Acre Foot of Water from the Carmel River Aquifer.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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*** 865 - POOR SPAWNING IN CARMEL RIVER FROM OVERPUMPING CAUSED WARM WATER.**

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of Poor spawning in Carmel River from overpumping caused warm water.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Poor spawning in Carmel River from overpumping caused warm water.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 866 - AQUIFER COMPACTION FROM OVERPUMPING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Aquifer Compaction from Overpumping.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Aquifer Compaction is a separate impact from Subsidence. Slight
subsidence can occur every year with normal rain and drought cycles.
Aquifer Compaction is the permanent loss of a soil's water bearing
capacity.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact
significance of
Aquifer Compaction from Overpumping.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 867 - NEW WATER HOOKUPS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
New Water Hookups.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

NEW CONNECTIONS CONTINUE
In the meantime, in the very face of "severe" rationing, Cal-Am and the District continue to allow new users to hook up to their water system. Among other projects Cal-Am recently hooked up a Car Wash at the mouth of Carmel Valley. Pacific Grove approved a 50,000 square foot expansion of a Supermarket on May 6 1998. Pebble Beach Company proposes another golf course and 350 houses. Carmel Valley's September Ranch was approved in December 1998 to build 100 houses and an Equestrian center. Although a judge turned the project down in Sept. 1999 in part because of a lack of water, the developer intends to try again.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
New Water Hookups.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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20b. If no margin of error is used please state that clearly.

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laws.

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46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 868 - ADDITIONAL WATER ALLOCATION FROM A WATER DISTRICT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Additional Water Allocation from a Water District.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Additional Water Allocation from a Water District.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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12. Please state the most extreme values which could be encountered.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 869 - RESIDENTIAL WATER USE INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Residential Water Use Increase.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Residential Water Use Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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* 870 - HOTEL WATER USE INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Hotel Water Use Increase.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Hotel Water use:
Standard hotels use 0.10 acre feet of water per room per year.

Luxury hotels use 0.21 acre feet of water per room per year.

Meeting Rooms use 0.541 acre feet of water per 1000 square feet per year.

Most standard hotels have swimming pools and spas.
Monterey Peninsula
Water Management District, May 2000

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Hotel Water Use Increase.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

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* 871 - MEETING ROOM WATER USE INCREASE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Meeting Room Water Use Increase.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Meeting Rooms use 0.541 acre feet of water per 1000 square feet per year. Monterey Peninsula Water Management District, May 2000

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Meeting Room Water Use Increase.

1b. If no objective criteria are used please state that clearly.

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* 872 - HOUSEHOLD WATER USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Household Water Use.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

A typical house on California's Monterey Peninsula uses one quarter of an acre foot of water per year (about 90,000 gallons) according to the Monterey Peninsula Water Management District.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Household Water Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 873 - SWIMMING POOL WATER USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Swimming Pool Water Use.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Any exposed body of water evaporates in warm weather. The rate depends upon air and water temperatures, humidity, and water surface area.
Carmel Valley's San Clemente Rancho pool evaporates about 2 inches per week in the summer. (About 1 acre foot of evaporation every 6 weeks per acre of swimming pool surface) Bruce Dormody, owner, personal communication.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Swimming Pool Water Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 874 - GOLF COURSE WATER USE.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of
Golf Course Water Use.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

An 18 hole golf course can use as much as 350 acre feet of water or more per year. California's Carmel Valley Ranch Resort used 372 acre feet in 1988 according to the Monterey Peninsula Water Management District.

Golf courses use considerably more water during startup years.
Golf courses can use 50% to double normal use during startup years (e.g. Pebble Beach Company's Spanish Bay golf course records show twice the normal amount of water use in its first few years).

"Greens may account for up to 10% of the area of a golf course."
-Richard D. Klein, Protecting the Aquatic Environment from the Effects of Golf Courses. Oct 1993

Golf Course Water Use	Acre Feet	Water Year
1 Cypress Point	110	1988
2 Monterey Peninsula Shore	117	1988
3 Monterey Peninsula Dunes	102	1988
4 Poppy Hills	142	1988
5 Pebble Beach	159	1988
6 Spyglass	147	1988
7 Spanish Bay	196	1988
8 Peter Hay	10	1988
9 Old Del Monte	158	1988
10 Pacific Grove	108	1988
11 Rancho Canada West	305	1988
12 Rancho Canada East	305	1988
13 Quail Lodge	327	1988
14 Carmel Valley Ranch	372	1988
15 Laguna Seca	239	1996
16 Navy School	198	1991
17 Ft Ord 1 (Bayonet)	0	1996
18 Ft Ord 2 (Black Horse)	282	1996
19 Pebble Beach Driving Range	7	1988
Total Acre feet =	3284	

(Data from Monterey Peninsula Water Management District.)

What is the Golf course water DEMAND (in acre feet / year) during construction?

What is the Golf course water SOURCE during construction?

What is the Golf course water DEMAND (in acre feet / year) during TURF startup?

What is the Golf course water SOURCE during TURF startup?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Golf Course Water Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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9. Please state the variance's MARGINS of ERROR or confidence level.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 875 - PEBBLE BEACH FIELDS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Pebble Beach Fields.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Pebble Beach Fields use large amounts of water.

Acre feet	
RLS Fields	12.1 (1990)
Practice fairway	6.5 (1990)
Collins Field	5.8 (PBC estimate)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Pebble Beach Fields.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
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* 876 - SPRINKLER WATER APPLICATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Sprinkler Water Application.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

"Sprinkler Irrigation loses significantly more water to evaporation than flood irrigation. Sprinkling exposes approximately 1000 times more water surface area to the air than flooding."
-Bill Ohrman, "I have had years of experience running an irrigated ranch and also heading an irrigation company." EFJ, Yule 2000

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Sprinkler Water Application.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 877 - FLOOD IRRIGATION.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Flood Irrigation.

Irrigation by sprinklers loses significantly more water to evaporation than flood irrigation. Sprinkling exposes approximately 1000 times more water surface area to the air than flooding.
-Bill Ohrman, "I have had years of experience running an irrigated ranch and also heading an irrigation company." EFJ, Yule 2000

* 878 - TURFGRASS WATER CONSERVATION PRACTICES.

The Document appears to have ignored this potentially feasible Mitigation.

If you do not adopt this mitigation measure, please explain fully why it is not feasible.

Please carefully analyze and disclose the potential benefits of Turfgrass Water Conservation Practices.

Irrigation by Need vs by Calendar Saves Significant Water
"Using visual indicators as a control [as opposed to calendar scheduling] and with tensiometers and pan evaporation as the guide to irrigatio scheduling, Marsh et al. (1980) and Youngner et al. (1981) used 55 percent less water on warm season grasses without loss of turfgrass quality."

Low-Water-Use Turfgrass
Some turfgrass selections can cut water consumption in half. "Turfgrass cultivars have a fairly wide range of water use rates making generalizations difficult." USGA

"Compared to other plants and landscape options, turfgrasses have relatively high rates of water consumption. In turfgrass systems, up to 90 percent of irrigation water and precipitation may be lost by evapotranspiration." USGA

Mowing

More frequent mowing decreases water consumption.
"Mowing with a dull blade decreased long-term water use by decreasing leaf area..." USGA

Fertilization
Turfgrass water use rates increase with increased nitrogen nutrition.
Feldrake et al. (1983) observed a 13% increase in water use when 0.4 kg 100 m² of nitrogen was applied monthly to Kentucky bluegrass during the spring and summer compared to a single spring application. USGA

* 879 - MORE PERSISTENT TRIBUTARY DELTAS IN MAINSTEM REDUCE SPAWNING HABITAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of More Persistent Tributary Deltas in Mainstem Reduce Spawning Habitat.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of More Persistent Tributary Deltas in Mainstem Reduce Spawning Habitat.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 880 - RIVERBANK HARDENING AND RIPARIAN AREA LOSS FROM CONCRETE RIP-RAP.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Riverbank Hardening and Riparian Area Loss from Concrete Rip-Rap.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Riverbank Hardening and Riparian Area Loss from Concrete Rip-Rap.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 881 - BREACHING RIVER MOUTH SAND BAR.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of Breaching River Mouth Sand Bar.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Breaching Sand Bar at River Mouth and water quality problems due to pesticide contamination have adversely affected fish and aquatic habitat." Pajaro River Watershed Management Plan, Final 1999 pg 3-124

Breaching a sand bar can flush fish into the ocean killing a large percentage.

Breaching a sand bar can reduce the water level in a lagoon decreasing the wetland area.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Breaching River Mouth Sand Bar.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 882 - FIRE PROTECTION WATER REQUIREMENTS.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of Fire Protection Water Requirements.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

NEW FIRE PROTECTION NEEDS AS OF MARCH 1999
The PUC Requires Cal-Am to provide fire service water connections to any property within the Cal-Am service area regardless of where the property's water supply originates.
"This ... has the potential to make it more difficult for Cal-Am to achieve the water production goal set by the State Water Resources Control Board (SWRCB) in its Order No. 95-10. Fire services require

periodic flushing and testing, and fire hydrant testing contributes to the amount of unaccounted water use within the Cal-Am system."
-MPWMD Staff Agenda Report pg 53, March 15 1999

Please quantify the maximum amount of water potentially needed for periodic flushing and testing.

Please quantify the amount and percentage of unaccounted water use.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Fire Protection Water Requirements.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 883 - EXTREMES OF HIGH OR LOW WATER.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Extremes of High or Low Water.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Extremes of High or Low Water.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 884 - RECLAIMED WATER USE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Reclaimed Water Use.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

Demand for Reclaimed water drops at least 25% during the rainy season.

Reclaimed water from the CAWD system has a salinity content too high
for use with golf course greens.

"... high salinity levels (commonly above an electrical conductivity of
four (4) deciSiemens per meter) for many crops) make it more difficult
for plant roots to extract water from the soil, which may reduce growth
rates." Donahue et al 1983, Soils: An Introduction to soils and plant
growth, Prentice-Hall

Please specify the users of the Reclaimed water and their estimated
daily use in amount.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Reclaimed Water Use.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH
criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 885 - WATER SUPPLY CAPACITY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Water Supply Capacity.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

Please graph the water capacity needed through the construction phase of the project.

Please graph the water capacity available and permitted through the construction phase of the project.

Please identify the source of water through the construction phase of the project.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Water Supply Capacity.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 886 - STRONG FREQUENT AND LONG (200 YEAR) DROUGHTS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Strong Frequent and Long (200 year) Droughts.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

CALIFORNIA HAS RECENTLY HAD TWO - ONE HUNDRED YEAR DROUGHTS
California has been subject to two droughts exceeding 100 years in the last 1000 years (1),(2). One drought exceeded two hundred years (3).

"..a study of tree stumps rooted in present day lakes, marshes and streams, which suggests that California's Sierra Nevada experienced extremely severe drought conditions for more than two centuries before AD ~ 1112 [AD 912] and for more than 140 years before AD ~ 1350 [AD 1210]. During these periods, runoff from the Sierra was significantly lower than during any of the persistent droughts that have occurred in the region over the past 140 years." (1)

"Meanwhile, researchers from the California State University believe they have found further evidence that small changes in global climate can have dramatic regional impacts. Radiocarbon data suggest that California suffered two periods of extended severe drought during the Medieval Warm Period between AD 900 to AD 1400. These droughts which lasted 220 years and 140 years respectively, were even more severe than the 1987-1992 drought and the Dust Bowl drought of the 1930s. Richard Madole from the US Geological Survey suggests that this different climate, with temperatures not much higher than current temperatures but with very much lowered water tables, could mean that California may already be near the threshold of desertification. The study prompted researcher, S. Stine, to state: "We can't predict when (another such) drought will come, but the consequences would be profound...The mind boggles about what would happen to California's agriculture, should global warming tip the Local climate towards another drought period." (From the GREENPEACE Climate Impacts Database Web site.)

Failing to recognize that California droughts can last and have lasted beyond a six (6) year period - to decades and centuries - makes conclusions based on a 6 year drought scientifically indefensible and invalid. According to accepted science AT THE VERY LEAST - ONE THIRD (33%) of California's last eleven hundred years experienced what we

define as drought conditions.

"The period from 1850 to 1950 had one of the lowest frequencies of drought of any one hundred years period in the 2089 year record [from 101 BC to AD 1988]." (4)

"The averages or norms of weather properties do not comprise a sufficient set of statistics to describe the atmospheric environment. The variability and particularly the extremes of weather are often more useful for climate applications than are norms." (5)

Central Coastal California Specifically
"There have been major fluctuations in precipitation variability including changes in the frequency of extremes and rare events that have not occurred in the modern record." (6)

"The extremely dry year of 1841 is also well documented. The reconstructed value for this year is only 0.53 inches [of rain], ..."

"Most of the seventeenth century was characterized by relatively high frequencies of extremes." "Variability continued at a high level into the beginning of the twentieth century, dropped markedly in the middle of the century, and began to increase again in the last 20-30 years." (6)
"There is some evidence in the last 20 years that conditions may be becoming more variable again. For example 1976 was the driest year in more than 50 years, and the second and third wettest years on record have occurred in 1978 and 1983." (6)

"If variability continues to increase, and evidence from the reconstructions suggest it might, the consequences for water use in Central California could be major."

"How successful would the present systems be in meeting demand during a period when six out of seven years were below normal, or during a five-year period when precipitation averaged two-thirds of normal, or during an individual year as dry as 1841?" (6)

(1) S. Stine, "Extreme and persistent drought in California and Patagonia during medieval time", Nature, v.369, p. 546-549, 16 June 1994

(2) F. Alayne Street-Perrott, "Climate change: Drowned trees record dry spell", Nature, v.369, p. 518, 16 June 1994

(3) "California's climate poised on a knife edge", New Scientist, p.10, 25 June 1994

(4) Hughes, M.K. and Brown, "Drought Frequency in Central California since 1012 B.C. recorded in giant sequoia tree rings." Climate Dynamics (1992) 6: 161-167

(5) Water Resources and Implications of CLimate Uncertainty, USGS 1989

(6) "400 years of Central California Precipitation Variability Reconstructed from Tree Rings", J. Michaelson, L. Haston, F. Davis, 1987.

a. Potential Drought Severity is highly underestimated. The worst drought year should be described and quantified.

Please recognize and incorporate into the calculations the true severity of local droughts.

b. Potential Drought Durations are highly underestimated. Please recognize and incorporate into the calculations that local droughts can and have lasted 100 to 200 years.

c. Potential Drought frequency is highly underestimated. At least one third and possibly as much as half of all years should be expected to be drought years. Please recognize and incorporate into the calculations the true frequency of local droughts.

Please prepare an analysis of the water runoff graphs during reasonably frequent severe, long droughts.

Please analyze the fewest number of years of drought which could render the project ineffective.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Strong Frequent and Long (200 year) Droughts.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergistic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 887 - DESERTIFICATION.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Desertification.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Desertification threatens about one third of the world's land surface and affects the lives of some 850 million people." (WWF, Atlas of Environment, 1990)

There are five main causes of desertification:

1. Deforestation, especially of upland watersheds.
2. inappropriate irrigation resulting in salinization or alkalization of agricultural land.
3. Overcultivation of poor soils.
4. Overgrazing by cattle, sheep, goats and camels on fragile rangeland.
5. excessive cutting of fuelwood in drylands. (WWF, Atlas of Environment, 1990)

"The [worldwide] process of desertification seems to be accelerating in

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Desertification.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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laws.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 888 - MEANWHILE, RESEARCHERS FROM THE CALIFORNIA STATE UNIVERSITY BELIEVE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Meanwhile, researchers from the California State University believe.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
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-
- * 889 - THEY HAVE FOUND FURTHER EVIDENCE THAT SMALL CHANGES IN GLOBAL CLIMATE.
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
they have found further evidence that small changes in global climate.
- If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.
- QUANTIFICATION OF BASELINES AND IMPACTS:
- This impact appears to be potentially significant.
- 1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of they have found further evidence that small changes in global climate.
 - 1b. If no objective criteria are used please state that clearly.
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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 890 - CAN HAVE DRAMATIC REGIONAL IMPACTS. RADIOCARBON DATA SUGGEST THAT.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
can have dramatic regional impacts. Radiocarbon data suggest that.

If you claim the document contains proof of no-significant impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
can have dramatic regional impacts. Radiocarbon data suggest that.

1b. If no objective criteria are used please state that clearly.

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* 891 - CALIFORNIA SUFFERED TWO PERIODS OF EXTENDED SEVERE DROUGHT DURING THE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
California suffered two periods of extended severe drought during the.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
California suffered two periods of extended severe drought during the.

1b. If no objective criteria are used please state that clearly.

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-

* 892 - MEDIEVAL WARM PERIOD BETWEEN AD 900 TO AD 1400. THESE DROUGHTS WHICH.

The Document appears to have ignored this potentially significant impact.
Please carefully analyze and disclose the potential impacts of

Medieval Warm Period between AD 900 to AD 1400. These droughts which.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 893 - LASTED 220 YEARS AND 140 YEARS RESPECTIVELY.

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* 894 - THAN THE 1987-1992 DROUGHT AND THE DUST BOWL DROUGHT OF THE 1930S..

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of
than the 1987-1992 drought and the Dust Bowl drought of the 1930s..

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

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than the 1987-1992 drought and the Dust Bowl drought of the 1930s..

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-

* 895 - RICHARD MADOLE FROM THE US GEOLOGICAL SURVEY SUGGESTS THAT THIS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of
Richard Madole from the US Geological Survey suggests that this.

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* 896 - DIFFERENT CLIMATE.

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* 897 - TEMPERATURES BUT WITH VERY MUCH LOWERED WATER TABLES.

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* 898 - CALIFORNIA MAY ALREADY BE NEAR THE THRESHOLD OF DESERTIFICATION. THE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
California may already be near the threshold of desertification. The.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

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* 899 - STUDY PROMPTED RESEARCHER.

* 900 - (ANOTHER SUCH) DROUGHT WILL COME.

* 901 - PROFOUND...THE MIND BOGGLES ABOUT WHAT WOULD HAPPEN TO CALIFORNIA'S.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of profound...The mind boggles about what would happen to California's.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of profound...The mind boggles about what would happen to California's.

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* 902 - AGRICULTURE.

-

* 903 - ANOTHER DROUGHT PERIOD." (FROM THE GREENPEACE CLIMATE IMPACTS.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of another drought period." (From the GREENPEACE Climate Impacts.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

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* 904 - DATABASE WEB SITE.).

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Please carefully analyze and disclose the potential impacts of Database Web site.).

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 905 - FAILING TO RECOGNIZE THAT CALIFORNIA DROUGHTS CAN LAST AND HAVE LASTED.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Failing to recognize that California droughts can last and have lasted.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Failing to recognize that California droughts can last and have lasted.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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-

* 906 - BEYOND A SIX (6) YEAR PERIOD - TO DECADES AND CENTURIES - MAKES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
beyond a six (6) year period - to decades and centuries - makes.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of beyond a six (6) year period - to decades and centuries - makes.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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* 907 - CONCLUSIONS BASED ON A 6 YEAR DROUGHT SCIENTIFICALLY INDEFENSIBLE AND.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of conclusions based on a 6 year drought scientifically indefensible and.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

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* 908 - INVALID. ACCORDING TO ACCEPTED SCIENCE AT THE VERY LEAST - ONE THIRD.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
invalid. According to accepted science AT THE VERY LEAST - ONE THIRD.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

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invalid. According to accepted science AT THE VERY LEAST - ONE THIRD.

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* 909 - (33%) OF CALIFORNIA'S LAST ELEVEN HUNDRED YEARS EXPERIENCED WHAT WE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of (33%) of California's last eleven hundred years experienced what we.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of (33%) of California's last eleven hundred years experienced what we.

1b. If no objective criteria are used please state that clearly.

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* 910 - DEFINE AS DROUGHT CONDITIONS..

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Please carefully analyze and disclose the potential impacts of define as drought conditions..

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

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40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 911 - THE PERIOD FROM 1850 TO 1950 HAD ONE OF THE LOWEST FREQUENCIES OF.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of

The period from 1850 to 1950 had one of the lowest frequencies of.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
The period from 1850 to 1950 had one of the lowest frequencies of.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 912 - DROUGHT OF ANY ONE HUNDRED YEARS PERIOD IN THE 2089 YEAR RECORD [FROM.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of drought of any one hundred years period in the 2089 year record [from.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of drought of any one hundred years period in the 2089 year record [from.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 913 - 101 BC TO AD 1988]. " (4).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
101 BC to AD 1988]. " (4).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of 101 BC to AD 1988]. " (4).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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* 914 - THE AVERAGES OR NORMS OF WEATHER PROPERTIES DO NOT COMPRISE A.

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of

The averages or norms of weather properties do not comprise a.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of The averages or norms of weather properties do not comprise a.

1b. If no objective criteria are used please state that clearly.

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* 915 - SUFFICIENT SET OF STATISTICS TO DESCRIBE THE ATMOSPHERIC ENVIRONMENT..

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of

sufficient set of statistics to describe the atmospheric environment..

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

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* 916 - THE VARIABILITY AND PARTICULARLY THE EXTREMES OF WEATHER ARE OFTEN MORE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of

The variability and particularly the extremes of weather are often more.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

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 46. Please provide the reverse of this impact as Mitigation.
 47. Please provide an ALTERNATIVE which avoids this impact.
 48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.
-
- * 917 - USEFUL FOR CLIMATE APPLICATIONS THAN ARE NORMS." (5).
- The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
useful for climate applications than are norms." (5).
- If you claim the document contains proof of no-significant-impact for
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- This impact appears to be potentially significant.
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 - 1b. If no objective criteria are used please state that clearly.
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 - 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
 - 3b. Please quote the definition used.
 4. If no measurement units are used please state that clearly.
 - 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
 - 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
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 7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
 8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
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 15. Please provide a graph of HISTORICAL measurements.
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 17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.
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 - 20s. Please state whether this MARGIN of ERROR is measured or assumed.
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* 918 - CENTRAL COASTAL CALIFORNIA SPECIFICALLY.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Central Coastal California Specifically.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

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(non-subjective) CRITERIA used to determine the impact significance of
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1b. If no objective criteria are used please state that clearly.

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* 919 - THERE HAVE BEEN MAJOR FLUCTUATIONS IN PRECIPITATION VARIABILITY.

The Document appears to have ignored this potentially significant impact.

Please carefully analyze and disclose the potential impacts of

There have been major fluctuations in precipitation variability.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

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* 920 - INCLUDING CHANGES IN THE FREQUENCY OF EXTREMES AND RARE EVENTS THAT HAVE.

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including changes in the frequency of extremes and rare events that have.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

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* 921 - NOT OCCURRED IN THE MODERN RECORD." (6).

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-
- * 922 - THE EXTREMELY DRY YEAR OF 1841 IS ALSO WELL DOCUMENTED. THE.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 923 - RECONSTRUCTED VALUE FOR THIS YEAR IS ONLY 0.53 INCHES [OF RAIN].

* 924 - MOST OF THE SEVENTEENTH CENTURY WAS CHARACTERIZED BY RELATIVELY HIGH.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of

Most of the seventeenth century was characterized by relatively high.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

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Most of the seventeenth century was characterized by relatively high.

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2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

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* 925 - FREQUENCIES OF EXTREMES." "VARIABILITY CONTINUED AT A HIGH LEVEL INTO THE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of frequencies of extremes." "Variability continued at a high level into the.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

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(non-subjective) CRITERIA used to determine the impact significance of frequencies of extremes." "Variability continued at a high level into the.

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* 926 - BEGINNING OF THE TWENTIETH CENTURY.

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* 927 - THE CENTURY.

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* 928 - THERE IS SOME EVIDENCE IN THE LAST 20 YEARS THAT CONDITIONS MAY BE.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
There is some evidence in the last 20 years that conditions may be.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

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* 929 - BECOMING MORE VARIABLE AGAIN. FOR EXAMPLE 1976 WAS THE DRIEST YEAR IN.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
becoming more variable again. For example 1976 was the driest year in.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

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1a. Please clearly identify by NAME and describe each of the objective

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-

* 930 - MORE THAN 50 YEARS.

-

* 931 - HAVE OCCURRED IN 1978 AND 1983." (6).

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
have occurred in 1978 and 1983." (6).

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

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* 932 - IF VARIABILITY CONTINUES TO INCREASE, AND EVIDENCE FROM THE.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 933 - RECONSTRUCTIONS SUGGEST IT MIGHT.

* 934 - CENTRAL CALIFORNIA COULD BE MAJOR."

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Central California could be major."

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Central California could be major."

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 935 - HOW SUCCESSFUL WOULD THE PRESENT SYSTEMS BE IN MEETING DEMAND DURING A.

The Document appears to have ignored this potentially significant Impact.

Please carefully analyze and disclose the potential impacts of

How successful would the present systems be in meeting demand during a.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of How successful would the present systems be in meeting demand during a.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 936 - PERIOD WHEN SIX OUT OF SEVEN YEARS WERE BELOW NORMAL.

* 937 - FIVE-YEAR PERIOD WHEN PRECIPITATION
AVERAGED TWO-THIRDS OF NORMAL.

-

* 938 - DURING AN INDIVIDUAL YEAR AS DRY AS 1841?"
(6).

The Document appears to have ignored this potentially
significant Impact.
Please carefully analyze and disclose the potential impacts
of
during an individual year as dry as 1841?" (6).

If you claim the document contains proof of no-significant-
impact for
this impact please explicitly state the page number and
paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the
objective
(non-subjective) CRITERIA used to determine the impact
significance of
during an individual year as dry as 1841?" (6).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe
how the threshold of significance chosen is scientifically
testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS
(numbers) used to determine the significance for EACH
criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to
determine the significance for each criteria.

5b. If no method of measurement was used please state that
clearly for each criteria and explain thoroughly how the data
was obtained.

6. Please quantify the existing or current BASELINE
measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level
and whether the MARGIN of ERROR is measured or
assumed.

8. Please state the VARIANCE or fluctuation, assumed or
expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or
confidence level.

10. Please state whether this MARGIN of ERROR is
measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be
encountered.

13. Please describe and quantify which criteria and
ASSUMPTIONS the Impact Significance predictions are
most SENSITIVE.

14. Please analyze and quantify how sensitive those
predictions are to reasonably foreseeable varying criteria and
assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time
period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the
impact changes from significant to less-than-significant and
the clear criteria and rationale for that
number.

19. Please provide the MARGIN of ERROR used (in percent
and absolute amount) for measuring the Significance
THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is
measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the
impact changes from LEGAL to ILLEGAL for ALL related and
potentially relevant local, state and federal
laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP
with increasing input, other impacts have complex non-linear
relationships. Please provide a graph that shows
whether the relationship is linear or otherwise - when at and
near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM
CHANGE, to which the IMPACT could raise or lower the
baseline number and its MARGIN of ERROR or confidence
levels.

24. Please state whether the MARGIN of ERROR is
measured or assumed.

25. Please state whether this total PERCENT maximum
change is an AVERAGE amount, a worst case expected or a
best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to
which the impact would raise or lower the baseline number
and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is
measured or assumed.

28. Please state whether this total maximum change amount
is an AVERAGE amount, a worst case expected or a best
case expected.

29. Please list all potential CUMULATIVE impacts related to
this one.

30 Please describe all potential CUMULATIVE impacts
related to this one.

31. Please quantify all potential CUMULATIVE impacts
related to this one.

32. Please list, describe and quantify all potential compound
and synergetic impacts.

33. Please list, describe and quantify all Construction
impacts related to this one.

34. Please list, describe and quantify all Growth impacts
related to this one.

35. Please list, describe and quantify all Indirect impacts
related to this one.

36. Please list and quantify every OTHER IMPACT - this
impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the
RESOURCE this impact affects.

38. Please state the METHOD of measurement used to
determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence
level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or
assumed.

41. Please quantify what is the maximum amount (in
AMOUNT of existing) of this resource that can be lost and
still be restored.

42. Please quantify what is the MAXIMUM amount (in
PERCENTAGE of existing) of this resource that can be
LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed
this impact.

44. Please cite each expert's training, and peer reviewed,
validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this
impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this
impact.

48. Please list all other studies initiated by the applicant
related to this impact, including subject matter breadth,
author's names and dates and where they
can be examined.

-

* 939 - (1) S. STINE.

-

* 940 - PATAGONIA DURING MEDIEVAL TIME".

-

* 941 - 1994.

The Document appears to have ignored this potentially
significant Impact.
Please carefully analyze and disclose the potential impacts
of
1994.

If you claim the document contains proof of no-significant-
impact for
this impact please explicitly state the page number and
paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the
objective
(non-subjective) CRITERIA used to determine the impact
significance of
1994.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe
how the threshold of significance chosen is scientifically
testable, repeatable, falsifiable,
credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS
(numbers) used to determine the significance for EACH
criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.	25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.	-
5a. Please state the METHOD of measurement used to determine the significance for each criteria.	26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	* 943 - DRY SPELL".
5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.	27. Please state whether the MARGIN of ERROR is measured or assumed.	-
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.	28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.	* 944 - (3) "CALIFORNIA'S CLIMATE POISED ON A KNIFE EDGE".
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.	29. Please list all potential CUMULATIVE impacts related to this one.	* 945 - P.10.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.	30. Please describe all potential CUMULATIVE impacts related to this one.	-
9. Please state the variance's MARGINS of ERROR or confidence level.	31. Please quantify all potential CUMULATIVE impacts related to this one.	* 946 - (4) HUGHES.
10. Please state whether this MARGIN of ERROR is measured or assumed.	32. Please list, describe and quantify all potential compound and synergetic impacts.	The Document appears to have ignored this potentially feasible Mitigation.
11. If an average is used, please state which kind of average.	33. Please list, describe and quantify all Construction impacts related to this one.	If you do not adopt this mitigation measure, please explain fully why it is not feasible.
12. Please state the most extreme values which could be encountered.	34. Please list, describe and quantify all Growth impacts related to this one.	Please carefully analyze and disclose the potential benefits of (4) Hughes.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.	35. Please list, describe and quantify all Indirect impacts related to this one.	since 1012 B.C. recorded in giant sequoia tree rings." Climate Dynamics (1992) 6: 161-167 (5) Water Resources and Implications of CLimate Uncertainty, USGS 1989 (6) "400 years of Central California Precipitation Variability Reconstructed from Tree Rings", J. Michaelson, L. Haston, F. Davis, 1987.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.	36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.	-
15. Please provide a graph of HISTORICAL measurements.	37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.	* 947 - WATER SUPPLY INTERRUPTIONS.
16. Please quantify the length of time this impact would last.	38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.	The Document appears to have ignored this potentially significant Impact.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.	39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.	Please carefully analyze and disclose the potential impacts of Water Supply Interruptions.
18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.	40. Please state whether the margin of error is measured or assumed.	If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.	41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.	QUANTIFICATION OF BASELINES AND IMPACTS:
20s. Please state whether this MARGIN of ERROR is measured or assumed.	42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.	This impact appears to be potentially significant.
20b. If no margin of error is used please state that clearly.	43. Please name each EXPERT who prepared and reviewed this impact.	1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Water Supply Interruptions.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.	44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.	1b. If no objective criteria are used please state that clearly.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.	45. Please provide AVOIDANCE MITIGATION for this impact.	2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.	46. Please provide the reverse of this impact as Mitigation.	3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
24. Please state whether the MARGIN of ERROR is measured or assumed.	47. Please provide an ALTERNATIVE which avoids this impact.	3b. Please quote the definition used.
	48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.	4. If no measurement units are used please state that clearly.
		5a. Please state the METHOD of measurement used to determine the significance for each criteria.

* 942 - (2) F. ALAYNE STREET-PERROTT.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 948 - DECREASED WATER QUANTITY FOR OTHER USES.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Decreased Water Quantity For Other Uses.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of
Decreased Water Quantity For Other Uses.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 949 - SEWAGE DISCHARGE DUE TO FLOODING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Sewage Discharge due to Flooding.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

During past flooding events Carmel Area Wastewater District CAWD has released sewage. This has resulted in cease and desist orders.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective
(non-subjective) CRITERIA used to determine the impact significance of
Sewage Discharge due to Flooding.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30. Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 950 - HUMAN HEALTH HAZARD DUE TO FLOODING.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Human Health Hazard Due to Flooding.

If you claim the document contains proof of no-significant-impact for
this impact please explicitly state the page number and paragraph.

The Southern California Coastal Water Research Project
states in January

1999 that "measurements for viruses found in the human digestive system have been taken, primarily at storm drain sites, along a 300 mile stretch of the California Coastline. Those viruses have been detected more than 50 percent of the time after heavy rains and are even detected in summer when only a trickle of water is coming through the storm drain."

During every Carmel River flood in the 1990's Monterey County Dept. of Environmental Health has issued a "No-Contact" warning due to excessive nitrate contamination of the river due to Carmel Valley septic systems.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Human Health Hazard Due to Flooding.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 951 - FLOODING CAUSED EVACUATION PROBLEMS.

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of
Flooding Caused Evacuation Problems.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Carmel Valley is a good example of a typical western river impacted by humans who did not plan for evacuations when flooding occurs.
There is a single road along one bank of the river and many houses are built into and near the 100 year floodplain. When flooding occurs there is dangerous traffic congestion as emergency staff and residents all need to use the single road at the same time.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Flooding Caused Evacuation Problems.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

*** 952 - RECLAIMED WATER FOR GOLF COURSES.**

The Document appears to have ignored this potentially significant Impact.
Please carefully analyze and disclose the potential impacts of Reclaimed Water for Golf Courses.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Demand for Reclaimed water drops at least 25% during the rainy season.
Reclaimed water from the CAWD system has a salinity content too high for use with golf course greens.

"... high salinity levels (commonly above an electrical conductivity of four (4) deciSiemens per meter) for many crops) make it more difficult for plant roots to extract water from the soil, which may reduce growth rates." Donahue et al 1983, Soils: An Introduction to soils and plant growth, Prentice-Hall

In the 1990's on the Monterey Peninsula in California a water district, a community services district and a corporation signed a contract to create recycled water for golf course use. The project failed to provide the promised water.

The deal (written by the corporation) gave the corporation some 380 acre feet of contract drinking water if the system generated 800 acre feet of reclaimed, or recycled, water.

The maximum amount of recycled water the project produced was only 500 to 600 acre feet, and even that water wasn't good enough to be used on the golf courses as it contained too much sodium (about 150 ppm v the needed 92 ppm). (Carmel Area Wastewater District General Manager Ray Van Doren at Pebble Beach Community Services District June 2000 meeting)

Golf Course Water Use	Acre Feet	Water Year
1 Cypress Point	110	1988
2 Monterey Peninsula Shore	117	1988
3 Monterey Peninsula Dunes	102	1988
4 Poppy Hills	142	1988
5 Pebble Beach	159	1988
6 Spyglass	147	1988
7 Spanish Bay	196	1988
8 Peter Hay	10	1988
9 Old Del Monte	158	1988
10 Pacific Grove	108	1988
11 Rancho Canada West	305	1988
12 Rancho Canada East	305	1988
13 Quail Lodge	327	1988
14 Carmel Valley Ranch	372	1988
15 Laguna Seca	239	1996
16 Navy School	198	1991
17 Ft Ord 1 (Bayonet)	0	1996
18 Ft Ord 2 (Black Horse)	282	1996
19 Pebble Beach Driving Range	7	1988
Total Acre feet =	3284	

Data from Monterey Peninsula Water Management District.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Reclaimed Water for Golf Courses.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 953 - LU-A2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
LU-A2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the
Primary mitigation measure:
LU-A2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the
primary mitigation measure:
LU-A2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the
primary mitigation measure: LU-A2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the

mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
LU-A2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
LU-A2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 954 - GSS A1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
GSS A1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
GSS A1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
GSS A1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: GSS A1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS A1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS A1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 955 - GSS A-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
GSS A-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
GSS A-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
GSS A-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: GSS A-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS A-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS A-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

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G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 956 - GSS B-1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
GSS B-1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
GSS B-1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
GSS B-1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: GSS B-1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS B-1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS B-1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 957 - GSS B-1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
GSS B-1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
GSS B-1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
GSS B-1-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: GSS B-1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS B-1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS B-1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 958 - GSS B-1-3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
GSS B-1-3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
GSS B-1-3.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
GSS B-1-3.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: GSS B-1-3.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS B-1-3.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:

GSS B-1-3.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 959 - GSS C1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
GSS C1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
GSS C1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
GSS C1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful

implementation of an identical or reasonably identical example for the primary mitigation measure: GSS C1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS C1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS C1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

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N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 960 - GSS C1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
GSS C1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
GSS C1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
GSS C1-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: GSS C1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS C1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs

unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS C1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

Founded in 1998, H.O.P.E. is a non-profit, tax deductible, public interest group protecting our Monterey Peninsula's natural land, air, and water ecosystems and public participation in government, using science, law, education, news alerts and advocacy.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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L1. Please explain clearly how the primary mitigation measure will be fully enforced.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 961 - GSS D1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
GSS D1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
GSS D1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
GSS D1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: GSS D1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS D1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS D1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 962 - GSS D2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
GSS D2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
GSS D2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
GSS D2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: GSS D2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS D2.

D2. Please provide a survey reporting the number of times this secondary

mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS D2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 963 - GSS D3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
GSS D3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
GSS D3.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
GSS D3.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: GSS D3.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: GSS D3.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: GSS D3.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

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MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

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O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

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P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 964 - GSS E1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE: GSS E1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
GSS E1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
GSS E1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: GSS E1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:

GSS E1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS E1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines

listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

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H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 965 - GSS E1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:

GSS E1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
GSS E1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
GSS E1-2.

using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: GSS E1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS E1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
GSS E1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

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E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

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MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 966 - BIO A1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO A1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO A1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO A1-1.
using the same units of measure used to determine the impact.

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TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO A1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs

unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO A1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
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NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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P1. Please list all potential impacts from the secondary mitigation measure

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EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 967 - BIO A1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO A1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO A1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO A1-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO A1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO A1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO A1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 968 - BIO A2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO A2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO A2.

using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO A2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO A2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO A2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO A2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 969 - BIO A3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO A3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO A3.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO A3.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO A3.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO A3.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO A3.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 970 - BIO A4.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO A4.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO A4.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO A4.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO A4.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY
Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO A4.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO A4.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

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G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 971 - BIO A5.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:

BIO A5.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the

Primary mitigation measure:

BIO A5.

using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO A5.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO A5.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

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C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO A5.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO A5.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 972 - BIO B1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO B1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO B1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO B1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO B1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is

defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

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G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

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AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

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MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

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P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 973 - BIO B1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO B1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the
Primary mitigation measure:
BIO B1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the
primary mitigation measure:
BIO B1-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the
primary mitigation measure: BIO B1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

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D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

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MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

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AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

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MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

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EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 974 - BIO B1-3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO B1-3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:

BIO B1-3.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO B1-3.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO B1-3.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-3.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-3.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

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G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

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H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

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MITIGATION IMPACTS

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O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

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P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 975 - BIO B1-4.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO B1-4.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO B1-4.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO B1-4.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO B1-4.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

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D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-4.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-4.

NEW LEVEL IF SUCCESSFUL

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

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MONITORING FREQUENCY

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K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 976 - BIO B1-5.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO B1-5.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO B1-5.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO B1-5.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO B1-5.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-5.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-5.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

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N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 977 - BIO B1-6.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO B1-6.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO B1-6.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO B1-6.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO B1-6.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-6.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:

BIO B1-6.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

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MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 978 - BIO B1-1C.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO B1-1C.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO B1-1C.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO B1-1C.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful

implementation of an identical or reasonably identical example for the primary mitigation measure: BIO B1-1C.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-1C.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-1C.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

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G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 979 - BIO B1-2C.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO B1-2C.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO B1-2C.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO B1-2C.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO B1-2C.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

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D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-2C.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs

unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO B1-2C.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

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G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

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O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 980 - BIO C1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO C1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO C1-1.
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B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO C1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO C1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: BIO C1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: BIO C1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 981 - BIO C1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO C1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO C1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO C1-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO C1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO C1-2.

D2. Please provide a survey reporting the number of times this secondary

mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO C1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

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G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 982 - BIO C1-3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO C1-3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO C1-3.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO C1-3.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO C1-3.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO C1-3.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO C1-3.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

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G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 983 - BIO D1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:

BIO D1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure: BIO D1-1. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure: BIO D1-1. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:

BIO D1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: BIO D1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G2. Please explain clearly how the secondary mitigation measure will be monitored.

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines

listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

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AGENCY ENFORCEMENT

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K2. Please list all agencies who will enforce the secondary mitigation measure.

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MITIGATION LOCATION

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MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

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P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

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EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

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* 984 - BIO D1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D1-2.

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TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 985 - BIO D1-3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D1-3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:

BIO D1-3.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:

BIO D1-3.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D1-3.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs

unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D1-3.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D1-3.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

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Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

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R. What will it cost, in time and money, to replace the loss from the impact?

* 986 - BIO D1-4.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D1-4.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D1-4.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D1-4.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D1-4.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

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D1. TRACK RECORD STUDY

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BIO D1-4.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D1-4.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

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J1. Please describe clearly how long the primary mitigation should last.

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AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 987 - BIO D2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

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G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

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MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

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MITIGATION IMPACTS

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P1. Please list all potential impacts from the secondary mitigation measure

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EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 988 - BIO D3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:

BIO D3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D3.
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B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D3.
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TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D3.

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D1. TRACK RECORD STUDY

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BIO D3.

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P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 989 - BIO D4.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D4.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D4.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D4.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D4.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D4.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D4.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 990 - BIO D4-1C.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D4-1C.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the

Primary mitigation measure:

BIO D4-1C.

using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D4-1C.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D4-1C.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D4-1C.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D4-1C.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 991 - BIO D4-2C.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D4-2C.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D4-2C.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D4-2C.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D4-2C.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is

defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D4-2C.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D4-2C.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 992 - BIO D5-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D5-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the
Primary mitigation measure:
BIO D5-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the
primary mitigation measure:
BIO D5-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the
primary mitigation measure: BIO D5-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D5-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D5-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

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MONITORING FREQUENCY

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I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

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K2. Please list all agencies who will enforce the secondary mitigation measure.

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MITIGATION LOCATION

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N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 993 - BIO D5-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D5-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D5-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D5-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D5-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D5-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D5-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 994 - BIO D5-3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D5-3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D5-3.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D5-3.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D5-3.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D5-3.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D5-3.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G2. Please explain clearly how the secondary mitigation measure will be monitored.

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

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* 995 - BIO D5-4.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D5-4.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D5-4.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D5-4.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D5-4.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D5-4.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D5-4.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 996 - BIO D5-5C.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D5-5C.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D5-5C.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D5-5C.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D5-5C.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D5-5C.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:

BIO D5-5C.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

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G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-
* 997 - BIO D6.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D6.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:

BIO D6.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:

BIO D6.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful

implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D6.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: BIO D6.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: BIO D6.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

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G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 998 - BIO D8-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D8-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D8-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D8-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D8-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D8-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs

unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D8-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

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G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

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G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

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I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

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MITIGATION LOCATION

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MITIGATION IMPACTS

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O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

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P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 999 - BIO D8-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D8-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D8-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D8-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D8-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D8-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D8-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

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E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

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H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 100 - BIO D8-3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO D8-3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO D8-3.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO D8-3.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO D8-3.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D8-3.

D2. Please provide a survey reporting the number of times this secondary

mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO D8-3.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

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G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 100 - BIO H1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO H1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO H1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO H1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO H1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO H1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO H1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

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EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 100 - BIO I1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO I1-1.

"CURE WORSE THAN THE DISEASE"

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BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO I1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO I1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO I1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:

BIO I1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO I1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines

listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 100 - BIO I1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO I1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO I1-2.

using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO I1-2.

using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO I1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO I1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO I1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

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E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

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G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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L1. Please explain clearly how the primary mitigation measure will be fully enforced.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 100 - BIO I2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
BIO I2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
BIO I2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
BIO I2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: BIO I2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs

unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO I2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
BIO I2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 100 - HWQ A1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
HWQ A1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
HWQ A1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
HWQ A1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: HWQ A1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
HWQ A1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
HWQ A1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

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MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 100 - HWQ A1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:

HWQ A1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
HWQ A1-2.
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B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
HWQ A1-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: HWQ A1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
HWQ A1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
HWQ A1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-
* 100 - HWQ B1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
HWQ B1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
HWQ B1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
HWQ B1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: HWQ B1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
HWQ B1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
HWQ B1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

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H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

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N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 100 - HWQ B1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
HWQ B1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
HWQ B1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
HWQ B1-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: HWQ B1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

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D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
HWQ B1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
HWQ B1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

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G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 100 - HWQ C3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
HWQ C3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the

Primary mitigation measure:

HWQ C3.

using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
HWQ C3.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: HWQ C3.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
HWQ C3.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
HWQ C3.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 101 - HWQ C6.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
HWQ C6.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
HWQ C6.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
HWQ C6.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: HWQ C6.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is

defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
HWQ C6.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
HWQ C6.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

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MONITORING FREQUENCY

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 101 - PSU D1C.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
PSU D1C.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the
Primary mitigation measure:
PSU D1C.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the
primary mitigation measure:
PSU D1C.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the
primary mitigation measure: PSU D1C.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
PSU D1C.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
PSU D1C.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

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P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 101 - PSU E1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
PSU E1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
PSU E1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
PSU E1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: PSU E1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
PSU E1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
PSU E1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

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MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

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P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 101 - PSU G1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
PSU G1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
PSU G1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
PSU G1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: PSU G1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

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D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
PSU G1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
PSU G1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 101 - AES A1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
AES A1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
AES A1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
AES A1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: AES A1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AES A1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AES A1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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MONITORING FREQUENCY

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P1. Please list all potential impacts from the secondary mitigation measure

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EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-
* 101 - AES A1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
AES A1-2.

"CURE WORSE THAN THE DISEASE"

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BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
AES A1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
AES A1-2.
using the same units of measure used to determine the impact.

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TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: AES A1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AES A1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:

AES A1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 101 - AES B1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
AES B1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
AES B1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
AES B1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful

implementation of an identical or reasonably identical example for the primary mitigation measure: AES B1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AES B1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AES B1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

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H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

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J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 101 - AES B1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
AES B1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
AES B1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
AES B1-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: AES B1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AES B1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs

unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AES B1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

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H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

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AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 101 - AES C1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
AES C1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
AES C1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
AES C1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: AES C1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AES C1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AES C1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

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G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

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MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

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P1. Please list all potential impacts from the secondary mitigation measure

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EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 101 - TC A1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC A1.

"CURE WORSE THAN THE DISEASE"

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BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC A1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC A1.
using the same units of measure used to determine the impact.

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TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC A1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC A1.

D2. Please provide a survey reporting the number of times this secondary

mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC A1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

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G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 102 - TC A2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC A2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC A2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC A2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC A2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: TC A2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: TC A2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 102 - TC B1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC B1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC B1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC B1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC B1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:

TC B1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC B1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines

listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 102 - TC B1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC B1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC B1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC B1-2.

using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC B1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC B1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC B1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

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G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

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MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 102 - TC B1-3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC B1-3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC B1-3.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC B1-3.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC B1-3.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs

unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC B1-3.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC B1-3.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

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MONITORING FREQUENCY

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J1. Please describe clearly how long the primary mitigation should last.

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EXPERT QUALIFICATIONS

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Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 102 - TC A1C.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC A1C.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC A1C.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC A1C.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC A1C.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC A1C.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC A1C.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 102 - TC A2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC A2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC A2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC A2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC A2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC A2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC A2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 102 - TC C2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC C2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC C2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC C2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC C2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC C2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC C2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 102 - TC D2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC D2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC D2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC D2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC D2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC D2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC D2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

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G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

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MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

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MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

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EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 102 - TC E2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC E2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the

Primary mitigation measure:

TC E2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC E2.
using the same units of measure used to determine the impact.

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TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC E2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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TC E2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC E2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 102 - TC F1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC F1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC F1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC F1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC F1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is

defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC F1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC F1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

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N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 103 - TC G1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC G1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the
Primary mitigation measure:
TC G1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the
primary mitigation measure:
TC G1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the
primary mitigation measure: TC G1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

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D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC G1-1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC G1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

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H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

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MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

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MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 103 - TC G1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC G1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC G1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC G1-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC G1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC G1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC G1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

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MITIGATION IMPACTS

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O1. Please list all potential impacts from the primary mitigation measure

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O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

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EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 103 - TC G1-3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC G1-3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC G1-3.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC G1-3.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC G1-3.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

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D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC G1-3.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC G1-3.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

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MONITORING FREQUENCY

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K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

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* 103 - TC G1-4.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC G1-4.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC G1-4.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC G1-4.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC G1-4.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC G1-4.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC G1-4.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

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L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

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* 103 - TC G1C.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
TC G1C.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
TC G1C.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
TC G1C.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: TC G1C.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
TC G1C.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:

TC G1C.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

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* 103 - AQ C1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
AQ C1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
AQ C1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
AQ C1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful

implementation of an identical or reasonably identical example for the primary mitigation measure: AQ C1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AQ C1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AQ C1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

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* 103 - AQ C2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
AQ C2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
AQ C2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
AQ C2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: AQ C2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AQ C2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs

unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
AQ C2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 103 - NOISE A1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
NOISE A1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
NOISE A1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
NOISE A1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: NOISE A1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: NOISE A1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure: NOISE A1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 103 - NOISE B1-1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
NOISE B1-1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
NOISE B1-1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
NOISE B1-1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: NOISE B1-1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-1.

D2. Please provide a survey reporting the number of times this secondary

mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 103 - NOISE B1-2.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
NOISE B1-2.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
NOISE B1-2.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
NOISE B1-2.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: NOISE B1-2.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-2.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-2.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 104 - NOISE B1-3.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
NOISE B1-3.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
NOISE B1-3.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
NOISE B1-3.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: NOISE B1-3.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:

NOISE B1-3.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-3.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines

listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

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L1. Please explain clearly how the primary mitigation measure will be fully enforced.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

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* 104 - NOISE B1-4.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
NOISE B1-4.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
NOISE B1-4.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
NOISE B1-4.

using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: NOISE B1-4.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-4.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-4.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 104 - NOISE B1-5.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
NOISE B1-5.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
NOISE B1-5.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
NOISE B1-5.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: NOISE B1-5.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs

unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-5.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-5.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 104 - NOISE B1-6.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
NOISE B1-6.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
NOISE B1-6.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
NOISE B1-6.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: NOISE B1-6.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-6.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-6.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 104 - NOISE B1-7.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
NOISE B1-7.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
NOISE B1-7.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
NOISE B1-7.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: NOISE B1-7.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-7.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-7.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSI's and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION

N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS

Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 104 - NOISE B1-8.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
NOISE B1-8.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
NOISE B1-8.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
NOISE B1-8.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: NOISE B1-8.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-8.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE B1-8.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

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E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

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MONITORING FREQUENCY

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J1. Please describe clearly how long the primary mitigation should last.

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MITIGATION LOCATION

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MITIGATION IMPACTS

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O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS

Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 104 - NOISE C1.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE:
NOISE C1.

"CURE WORSE THAN THE DISEASE"

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure:
NOISE C1.
using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure:
NOISE C1.
using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE

C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: NOISE C1.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY

Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE C1.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental the proposed mitigation measure:
NOISE C1.

NEW LEVEL IF SUCCESSFUL

E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING

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So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

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G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

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G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY

I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT

K1. Please list all agencies who will enforce the primary mitigation measure.

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MITIGATION LOCATION

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O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

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* 104 - CR B1.

MITIGATION QUANTIFICATION

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CR B1.

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TRACK RECORD EXAMPLE

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Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

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R. What will it cost, in time and money, to replace the loss from the impact?

CITIZEN ENFORCEMENT

CEQA requires that Mitigation Measures and Conditions of Approval be "Fully enforceable." CEQA Section 21081.6

A. Please identify the names of all Agency documents which track mitigation measures. If no such documents exist, please state that clearly.

B. For each agency charged with mitigation monitoring, please describe the complaint steps for citizens.

C. Please describe the yearly budget for each agency provided to enforce mitigation monitoring.

D. Please describe how many full time and part time staff in each agency enforce mitigation monitoring. Do not include administrative staff.

E. Please describe the number and nature of complaints each agency has had in the past ten years for failure to enforce mitigation.

F. Please list all legal remedies for citizen complaints about any mitigation failure or implementation.

G. If there are no legal remedies for citizens complaints - please clearly state there are no legal remedies.

Please put us on your list of "Interested Parties" so we get all notices of the project (if for no other reason than we ask under authority of CEQA Sections: 21092.(b)(3) and 21092.2)

With all due Respect,
-David Dilworth, Executive Director

Definitions:

CEQA requires Consultation under several circumstances specifically Sections 21080.1, 21104, 21153, and 21092.4(a). We have observed many instances where the lead agency considered "consultation" to mean "We sent them a notice, but we don't know and we don't care if they read it."

Notice is information going in one direction only.
Consultation means information goes in two directions.
Notice means sending information.
Consultation means "We got some kind of written response."

Please carefully and clearly Define "Consultation" as you have used it to comply with CEQA requirements for this project.

Please remember:

NEPA 40 CFR 1503.4
"(a) An agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively, and shall respond by one or more of the means listed below, stating its response in the final statement."

CEQA Guideline 15088. Evaluation of and Response to Comments

"(a) The Lead Agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments."

"(b) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. CONCLUSORY STATEMENTS UNSUPPORTED BY FACTUAL INFORMATION WILL NOT SUFFICE."

* A detailed response is required when a comment raises a specific issue.
Cleary v County of Stanislaus (1981) 118 CA3d 348

Founded in 1998, H.O.P.E. is a non-profit, tax deductible, public interest group protecting our Monterey Peninsula's natural land, air, and water ecosystems and public participation in government, using science, law, education, news alerts and advocacy.
Printed On 35% Post-Consumer Recovered Fiber.