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#73

Thom McCue
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Salinas, CA

Thursday, February 19, 2004

Comments on -- Proposed Pebble Beach Golf Course and Mansions Draft Environmental Impact Report is Monstrously Defective

Hello Mr. McCue,

We feel certain you really care about our environment or you wouldn't be in public service. We are writing to ask for your cooperation and avoid negative publicity for your agency and your department.

Due to the genuine environmental impacts of the project even with the mitigations proposed, we must object to the project and its associated environmental analysis.

We must most strongly object to the Draft Environmental Impact Report.

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 incontrovertable 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")

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 (FONSIs) 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.2nd 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.
Cleary 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 chromatographer/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 & Wellsma; 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. The DEIR provides some criteria values but omits most others and ignores some (reduction in number of a listed species).

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 an 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 acres - 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, quantify 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 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 amphibia."

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.

* 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 juristictions (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, 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.

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 subglutanins). 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.

Carmel GENERAL PLAN INADEQUACY Street curbs are specifically prohibited, yet upper Ocean avenue was repaved and had curbs added in the 1990s.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be 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 synergetic impacts.

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

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

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

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

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

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

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

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

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

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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.

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

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.

* 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 buss people in from Ft. Ord.

* 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. 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.

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.

* 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.

* 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 analagous 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.

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 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 quantity 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. 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.

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.

* 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 levaing 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.

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

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

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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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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* 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 polution patterns or community behavioral patterns may affect the quality of the human environment much more than impacts
on air or soild 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 Neglive 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.

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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, repealable, falsifiable, credible and defensible.

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

3b. Please quote the definition used.

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

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

5b. If no method of measurement was used please state that clearly 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.

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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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* 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 pessistent 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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* 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.

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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.

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

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

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

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

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

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

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

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

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

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

15. Please provide a graph of HISTORICAL measurements.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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 occurances and weight or mass od each occurance.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be 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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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 occuring 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.

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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.

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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 Miligation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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 T'ang-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.

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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.

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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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* 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.

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

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values.

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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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* 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.

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* 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.

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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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48. Please list all other 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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* 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.

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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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* 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.

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" 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 Afisal 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.

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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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* 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.

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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.

* 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.

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

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

* 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.

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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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.

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* 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.

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

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

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

* 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 Miligation.

47. Please provide an ALTERNATIVE which avoids this impact.

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

* 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.

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.

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

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

* 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.

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

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

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

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

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

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

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

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

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

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

15. Please provide a graph of HISTORICAL measurements.

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

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

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

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

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

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

21. Please 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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values.

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

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

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

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

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

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

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

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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.

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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.

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

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

15. Please provide a graph of HISTORICAL measurements.

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

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

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

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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. 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 congetion, 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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16. Please quantify the length of time this impact would last.

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

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

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

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

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

21. Please 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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values.

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

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

* 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	Summer?	227,000 T, >400,000	Hwy 1 & 68
ATT Golf Tournament	Jan/Feb	150,000 Sp	Hwy 1 & 68
Salinas Airshow	Fall	80-90,000	Salinas rds
Laguna Seca CART	Sep	113,000	Hwy 68,218,1
Laguna Seca	Oct		Hwy 68,218,1
Laguna Seca	3 more/year		Hwy 68,218,1
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 Triathalon	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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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 affeected 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.

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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.

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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.

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

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

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex 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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45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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 car 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.

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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.

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

14. 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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19. Please provide the MARGIN of ERROR 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.

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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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* 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 occuring 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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* 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.

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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.

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* 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.

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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 miligation could increase.

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

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

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

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

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

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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.

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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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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 Miligation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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.

* 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 electricty 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.

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

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

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

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

15. Please provide a graph of HISTORICAL measurements.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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 electricy 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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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.

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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 Miligation.

47. Please provide an ALTERNATIVE which avoids this impact.

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

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

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

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

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

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

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

15. Please provide a graph of HISTORICAL measurements.

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

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

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

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

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

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

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

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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.

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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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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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23. Please quantify 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.

38. Please state the METHOD of measurement used to determine the limit of the 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.

* 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.

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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.

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

38. Please state the METHOD of measurement used to determine the limit of the 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.

* 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.

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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.

-

* 59 - UNDERGROUNDING OF POWER TRANSMISSION AND DISTRIBUTION LINES.

The Document appears to have ignored this potentially feasible Mitigation. 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 or 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 rythms, or arrythmias." 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 Miligation.

47. Please provide an ALTERNATIVE which avoids this Impact.

48. Please list all other 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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* 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. 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. 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 unecessarily 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.

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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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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.

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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.

* 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 unecessarily 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.

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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.

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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.

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

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

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

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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 Miligation. 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 - LESSENED 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.

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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.

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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.

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* 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.

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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 - LESSENED 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.

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

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

* 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.

3b. Please quote the definition used.

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

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

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

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

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

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

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

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

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

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

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

14. 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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values.

23. Please quantify 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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35. Please list, 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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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.

* 71 - WATER FLOW TO FIRE HYDRANTS.

The Document appears to have ignored this potentially significant Impact. 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

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be 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 Flow 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.

3b. Please quote the definition used.

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

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

5b. If no method of measurement was used please state that clearly 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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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be 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.

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

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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.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically 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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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

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

* 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.

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

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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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48. Please list all other 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.

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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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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.

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

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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.

* 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.

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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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.

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

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

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

38. Please state the METHOD of measurement used to determine the limit of the 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.

* 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.

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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.

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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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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.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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 areass 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.

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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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values.

23. Please quantify 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.

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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.

* 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.

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

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

47. Please provide an ALTERNATIVE which avoids this impact.

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

* 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, repealable, falsifiable, credible and defensible.

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

3b. Please quote the definition used.

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

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

5b. If no method of measurement was used please state that clearly 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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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.

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

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

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

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

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

* 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.

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

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

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

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

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

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

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

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

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

15. Please provide a graph of HISTORICAL measurements.

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

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

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

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

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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values.

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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 Miligation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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.

3b. Please quote the definition used.

4. If 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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45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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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* 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.

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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.

-

* 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.

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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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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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.

18. Please 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.

* 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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

45. Please provide AVOIDANCE MITIGATION for this impact.

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

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other 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.

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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.

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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.

* 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.

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

13. Please describe and quantify which criteria and ASSUMPTIONS 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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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.

* 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.

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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.

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* 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.

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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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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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* 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 occured 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.

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* 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.

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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.

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

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

26. Please 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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* 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.

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

47. Please provide an ALTERNATIVE which avoids this impact.

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

* 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.

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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.

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

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