

General Farm Investment Co.

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Monterey County
Planning and Building
Inspection Administration

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January 23, 2009

Carl Holm
County of Monterey
RMA – Planning Department
168 West Alisal St., 2nd Floor
Salinas Ca 93901

Dear Mr. Holm,

After reading through the DEIR for our county's latest version of the General Plan Update, I have several comments in relation to various sections of the DEIR.

First, several comments need to be made regarding the section on Climate Change/Greenhouse Gases. They need to be prefaced with a discussion of the Intergovernmental Panel on Climate Change (IPCC).

The studies done by the Intergovernmental Panel on Climate Change have been largely debunked by various scientists and scientific organizations. Of specific interest is the fact that the IPCC's modeling has been constructed using data generated by Dr. James Hansen of NASA's Goddard Institute for Space Studies. However, in regard to his claims that October of 2008 was the hottest

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October on record, it soon came to light that the data produced by NASA to make that claim, and in particular temperature records covering large areas of Russia, was merely carried over from the previous month. NASA had used temperature records from the naturally hotter month of September and claimed they represented temperature figures in October. When NASA was confronted with this glaring error, they then attempted to compensate for the lower temperatures in Russia by claiming they had discovered a new "hotspot" in the Arctic, despite satellite imagery clearly showing that [HYPERLINK "http://www.prisonplanet.com/arctic-ice-grows-30-per-cent-in-a-year.html"](http://www.prisonplanet.com/arctic-ice-grows-30-per-cent-in-a-year.html) Arctic sea ice had massively expanded its coverage by 30 per cent, an area the size of Germany, since summer 2007.

The figures published by Dr Hansen's institute are one of the primary sets of data used by the IPCC to promote its case for man-made global warming and they are widely quoted because they consistently show higher temperatures than other figures.

"Yet last week's latest episode is far from the first time Dr Hansen's methodology has been called in question," reports the London Telegraph. "In 2007 he was forced by Mr. Watts and Mr. McIntyre to revise his published figures for US surface temperatures, to show that the hottest decade of the 20th century was not the 1990s, as he had claimed, but the 1930s." (US meteorologist Anthony Watts and Steve McIntyre, the Canadian computer analyst who won fame for his expert debunking of the notorious "hockey stick" graph.)

This is of particular relevance to our discussion of the DEIR due to the fact that the DEIR uses the IPCC as an authoritative reference in its discussion of Greenhouse Gases (see 4.16.3.1, etc). The IPCC temperature modeling

included in the DEIR is, therefore, questionable at best. My own question is: why is the County accepting questionable DEIR conclusions based upon faulty premises and fake data? What is the County's response to all of this?

Furthermore, why is the DEIR descending into feckless speculation with such comments as "Large increases in global temperatures could have massive deleterious impacts on the natural and human environments"? This inane comment is found at the bottom of 4.16-2 in the Climate Change section. Logic dictates that an equally reckless speculation might be made in converse of this original comment, such as – "Large increases in global temperature could have massive positive impacts on the natural and human environments by increasing agricultural outputs, encouraging the spread of beneficial and valuable flora, and rendering many intemperate and arid zones arable." My question is: if speculation is going to be made in one philosophical and/or politically-charged direction, why is not being made in the other direction as well in order to achieve speculative balance? Please update the DEIR in this regard.

In addition, it should be pointed out that a rather unintelligent comment is made at the top of page 4.16-3 (still in Climate Change) regarding what constitutes a Greenhouse Gas (GHG) and how those are further defined. GHGs include water vapor, CO₂, methane, ozone, nitrogen, nitrous oxide, etc. The section in question then goes on to say that GHG are global pollutants. Water vapor is a global pollutant? Nitrogen is a global pollutant? We would all die – the Earth would die – without the massive amounts of water vapor and nitrogen that, incidentally, make up the majority of our Earth's atmosphere (nitrogen makes up about 80% of our atmosphere). I merely point out this bagatelle in order to further underscore the lack of logic and intelligence of Jones & Stokes, which, in turn, further underscores the relatively limited value of this DEIR in general.

Continuing along the lines of feckless and reckless speculation, 4.16.3.2 is an admirable model in this regard. Among other crystal ball predictions, this section speculates that climate change could – should we discuss the implications of the word “could”? – change increase the severity of winter storms, could increase heat-related human deaths, could raise the sea level along the California coast, etc. ad nauseum. These, at best, are reckless speculation and generate a great many concerns about the intelligence of the DEIR writers, their political persuasion and their assumptions. However, my question is: why are all the speculations, if we must make speculations regarding climate change and global warming, negative? Why is there not one positive speculation? Where are the facts and studies that support the implications of the aforementioned speculation? Please elaborate and update the DEIR in this regard.

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In the Emissions Summary section of Climate Change 4.16.3.3, in the area that states that California is estimated to be the 12th to 16th (that’s quite a spread in the estimate, isn’t it?) largest emitter of CO2 and is responsible for approximately 2 percent of the world’s CO2 emissions, it might be mature to also point out, merely for the sake of thoroughness, that greenhouse gases only make up about 3% of the atmosphere by volume – consisting of varying amounts of water vapor and clouds (about 97%), with the remainder being gases like CO2, ozone, etc. Thus, CO2 constitutes about 0.037% of the atmosphere. Therefore, to sum this up, California is responsible for about 2% of 0.037%, which works out to 0.00074%. That is obviously an enormous amount.

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In Mitigation Measure CC-3 – Promote Alternative Energy Development, why isn’t nuclear power discussed? It is remarkably narrow-minded to not even

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discuss the option of nuclear power.

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In Mitigation Measure CC-4 – Promote Recycling and Waste Reduction, why is the figure 75% picked for a waste diversion goal? Where are the calculations that resulted in that particular number? Why not 65%? 85% or 83.4%?

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On page 4.16-34 of the Climate Change section, the DEIR writers admit that California Executive Order S-3-05 only applies to state agencies – NOT local governments – in terms of the goal of reducing GHG emissions by 80 percent below 1990 levels by 2050. The DEIR writers then proceed by saying “nevertheless, for this analysis, substantive reductions in emissions are assumed necessary after 2020 and 2030 in order to address cumulative GHG emissions and associated climate change effects.” This is a huge assumption. Why was it assumed necessary to make this assumption? Why is this assumption being made when this order only applies to state agencies and not local governments? What is the practical alternative if this order is not necessary for Monterey County? Why was the practical alternative not stated and studied in the DEIR?

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Another question that must be answered with logic and clarity (as opposed to the vagueness with which this issue has hitherto been addressed) is that of why the DEIR deals with two different time periods: the 2030 planning horizon as well as the year 2092 (the supposed year when all land designated for development under the General Plan Update is built out). Why is the DEIR assessing potential impacts for 84 years? The General Plan is supposed to be for 20 years, not 84 years. The County will obviously do several more General Plan updates between now and 2092, so why would we be assessing impacts that should be dealt with in future General Plans? Furthermore, speculating on

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what is going to happen for the duration of 84 years descends into something akin to crystal-ball gazing. How on earth can anyone surmise what state various species, economies, populations, climate change, etc., will be in 84 years? Where are the facts that support this speculation? Where are the facts that support the assumption that planners and analysts can successfully forecast eight decades into the future? To speculate – nay, to speculate and then codify into plans and ordinances – is pure foolishness and a profligate waste of taxpayer money. Details and discussion pertaining to 2092 should be removed from the DEIR.

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Yet another section in the DEIR that must be stricken is Mitigation Measure BIO-1.5 (page 4.9-78). This mitigation recommends that a countywide Habitat Conservation Plan (HCP) be implemented. There are many flaws with this idea, including the virtual impossibility of implementation due to astronomical costs, the fact that the measure is not supported by any facts in the record, etc. However, one other thing must be pointed out in this regard. Jones & Stokes, the preparers of this DEIR, make a great deal of money in various parts of California by setting up HCPs. For them to recommend that the County implement an HCP is a direct conflict of interest. This must be addressed.

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Another area of immense concern is in the Water Resources section, specifically the WR-1 mitigation found on page 4.3-130. In a nutshell, this verbiage calls for the inclusion of a new PS-3.16 that would implement a regional group to generate new water supply projects, management programs, agency agreements, etc, that would provide additional domestic water supplies for the Monterey Peninsula and Seaside basin. The subtext here is transferring water out-out-basin and to another area. This means lawsuits. Farming will be pitted against urban areas, as soon as the next drought occurs that forces any

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sort of hierarchy of priority in water usage. Water taken out of Zone 2C will further exacerbate that area's ability to combat saltwater intrusion (where is the environmental analysis of this potential exacerbation?). In addition, there are a great many water problems in Zone 2C that must be dealt with before considering such things as cooperative regional supply. Furthermore, it was disappointing to see that the DEIR did not take the time and effort to explore how areas such as the Monterey Peninsula and Seaside might solve their own water problems via such things as desal plants, the proper maintenance of the Carmel River, etc. I would request that the DEIR analyze properly such options available to the Peninsula, etc., before delving into fantastical notions of cooperative regional supply ideas.

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Another issue which must be addressed with intelligence and clarity is the fact that the DEIR used incorrect AMBAG growth forecast numbers. The DEIR used numbers from 2004, even though numbers were available from 2008. This is akin to a surgeon deciding to reference his patient's bloodwork from 2 years ago as opposed to bloodwork done the day before the scheduled surgery. Any surgeon behaving like that would quickly be out of a job.

The 2004 AMBAG forecast projected a 35,123 person increase in population from 2000 to 2030 and 28,198 new jobs. In sharp and marked contrast, the 2008 forecast projects only a 13,204 person increase in population from 2000 to 2030 and 17,909 new jobs. The projected population growth from the 2008 analysis is 62% less than the 2004 analysis. Let me repeat that: 62%. Sixty-two percent.

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The DEIR gives three reasons as to why it did not use the correct numbers but, instead, chose to use the false numbers.

The AMBAG 2004 numbers were used as the basis for the regionally approved Traffic Model. Therefore, using the 2004 numbers for the DEIR will make the population and traffic assumptions consistent.

The adopted Housing Element is based on the 2004 numbers. Using the same 2004 numbers for the rest of the plan maintains internal consistency between the Housing Element and all other elements of the plan.

The 2004 numbers are higher than those of the CA Dept Finance and AMBAGs 2008 numbers. Using the higher numbers leads to more conservative results for CEQA analysis.

Basically, these three reasons are lazy nonsense. Keeping the population and traffic assumptions consistent in this scenario simply means they're both equally wrong. Keeping the Housing Element consistent with the rest of the elements, by having them all employ the 2004 AMBAG numbers, simply means they're all equally wrong. Using the higher numbers in order to lead to more conservative CEQA analysis results is irrelevant – the numbers are still wrong.

People working in the private sector would lose their jobs over a scenario like this. If the DEIR is going to use false numbers in this one area, heck, why not just use false numbers for the whole plan? Was that particular option sufficiently analyzed?

In short, and to end this all, I found the DEIR to be a peculiar mix of pessimistic speculation (pessimistic when it suited the obvious environmental bent of the writers) and positive speculation (positive when it, again, suited the obvious environmental bent of the writers). The DEIR must be rewritten in order to reflect an impartial point of view, as opposed to the biased and agenda-driven point of view of the DEIR consultants. It is imperative that the County engage in

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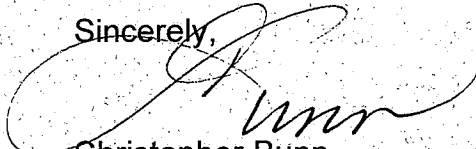
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environmental analysis of a non-speculative and purely factual manner. I do not want my tax money being spent on speculative, agenda-driven analysis.

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I trust that all my questions and concerns will be answered with thoroughness, and that the DEIR be modified accordingly. I look forward to hearing from you.

Sincerely,



Christopher Bunn