

August 22, 2023

Dear Michael DeLapa,

Per your request, EcoDataLab has reviewed and analyzed the City of Monterey's proposal to include the Ryan Ranch and Fort Ord site ("Fort Ord") as a Tier 1 Opportunity Site for its 2023 Housing Element. Based on our analysis, I believe that new development at Fort Ord is likely to have per-capita vehicle miles traveled (VMT) which are *higher* than the countywide average, and that this increase in VMT would constitute a significant impact under CEQA using the City of Monterey's adopted VMT policy.

EcoDataLab uses state-of-the-art research and data to help communities understand their complete carbon footprints and take the most effective actions to reduce environmental impacts. We have partnered with the CoolClimate Network at UC Berkeley to develop models of household behavior, including VMT and energy use, to predict consumption-based emissions. Our model outputs and findings are used by over a dozen cities and counties across the US and Canada to understand and address their consumption-based emissions, including San Francisco<sup>1</sup>, Seattle<sup>2</sup>, and New York City<sup>3</sup>.

For this analysis of the Fort Ord site, we used our Household VMT model and US Census data to determine per capita household VMT for Monterey County and for existing communities near Fort Ord. Because our methodology evaluates only household VMT, and it includes all household trips (including non-home trips), it is not directly comparable to the methods used to develop or evaluate VMT impacts for CEQA analysis. Our methodology cannot predict or determine CEQA impacts. However, it can provide a useful comparison of household VMT across a county, and in doing so can allow for a reasonable approximation of the direction and magnitude of household VMT in a proposed development compared to the countywide average.

A map of our modeled outputs for Monterey County household VMT is included in Figure 1.

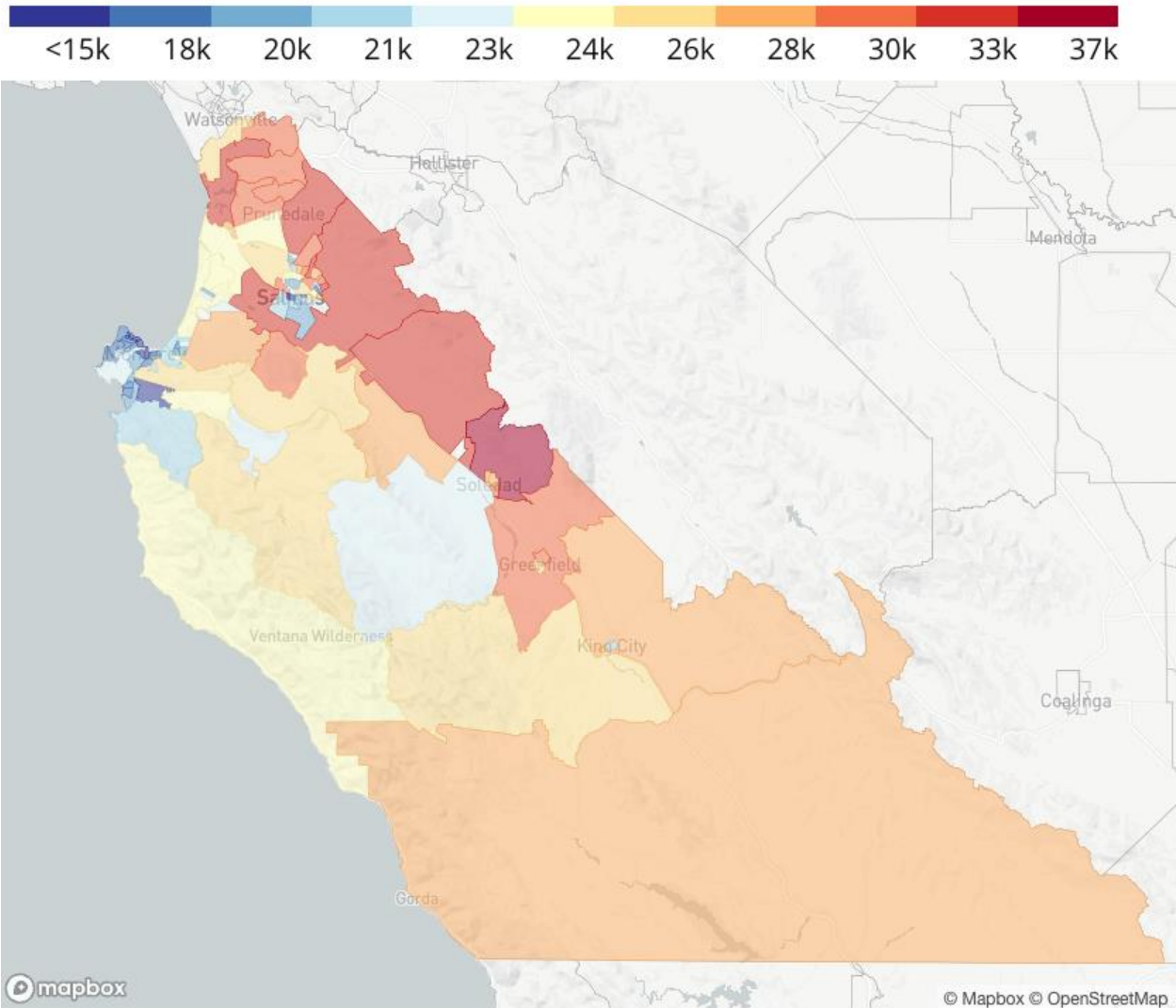
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<sup>1</sup> <https://escholarship.org/uc/item/4k19r6z7>

<sup>2</sup> <https://www.seattle.gov/environment/climate-change/climate-planning/performance-monitoring#consumptionemissions>

<sup>3</sup> <https://climate.cityofnewyork.us/wp-content/uploads/2023/04/NYC-Household-Consumption-GHG-Emissions-Inventory.pdf>

## Data: Vehicle Miles Traveled (VMT) per household

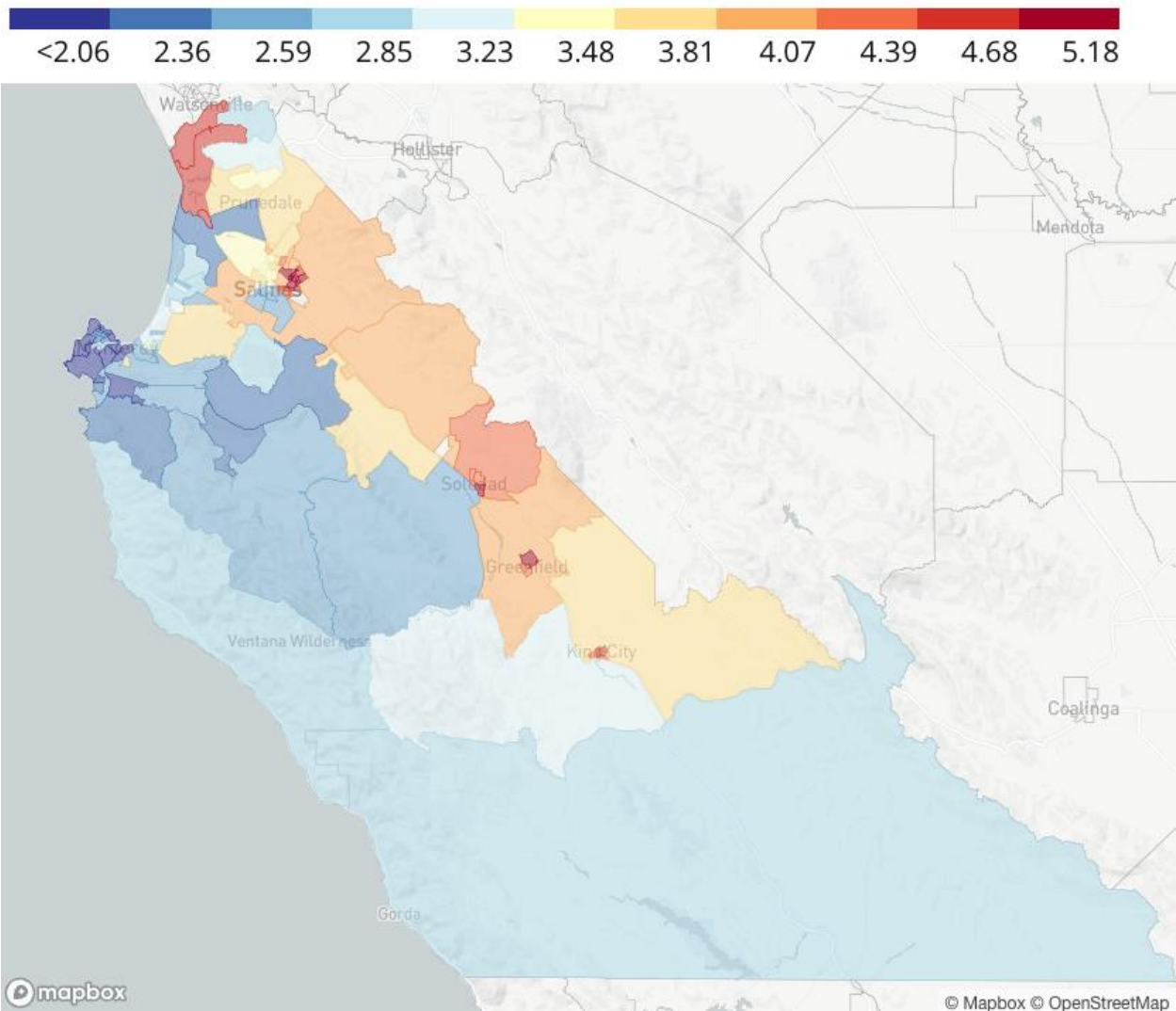


**Figure 1. Monterey County Household VMT map (2021)**

Countywide, the average household VMT is estimated at 24,904 miles per household. The City of Monterey has adopted per capita VMT metrics, not per household, and so these VMT estimates must be divided by household size to calculate VMT per capita. (Mapped VMT per capita data was not immediately available).

Figure 2 shows household size data across the county.

## Data: Household size



**Figure 2. Monterey County Household Size Map (2021)**

The average household size in Monterey County is 3.14, for a total of 7,931 VMT per capita.

We evaluated two Census tracts adjacent to the proposed Fort Ord site to determine their present-day estimated VMT per capita.

Census tract 06053013200 ("13200") is a geographically large tract stretching from Cabrillo Highway on the west to Laureles Grade Road on the east, bordered to the north by Fort Ord and the Monterey Regional Airport.

Census tract 06053013400 ("13400") is a geographically compact tract of the Del Rey

Oaks neighborhood, tracking Canyon Del Rey boulevard from N Fremont St to the Monterey Salinas Highway. It is bordered to the north by the city of Seaside, to the east by the Fort Ord site, and to the southwest by the Monterey Regional Airport. It is immediately north of 13200. Images of tracts 13200 and 13400 are attached.

The average household VMT, household size, and average per capita VMT for these census tracts and Monterey County are in Table 1.

**Table 1. Per Capita VMT Breakdown by tract**

<b>Location</b>	<b>Per Household VMT</b>	<b>Household Size</b>	<b>Per Capita VMT</b>	<b>% Difference from County</b>
Monterey County	24,904	3.14	7,931	-
Tract 13200	24,765	2.58	9,599	+21%
Tract 13400	23,375	2.5	9,350	+18%

Both of these neighboring tracts have significantly higher per capita VMT than the county average under our Household VMT model.

In addition to these modeled estimates, the Fort Ord site is roughly 5 miles or further from major destinations like Downtown Monterey, the Del Monte Shopping Center, and the Edgewater Shopping Center, and still further from many major employers. Due to this geographic distance, adults living at the Fort Ord site may not be able to live ordinary lives without driving an average of roughly 10+ miles per day to visit common destinations. The City's threshold of significance is 9.7 VMT per capita.

Based upon these analyses, it seems likely that new development near Fort Ord would exceed CEQA thresholds for significant impacts from VMT. I encourage you to urge the City to evaluate alternative locations for new housing, closer to key destinations and with greater access to transit and bicycle infrastructure that will reduce the need for automobile ownership and usage.

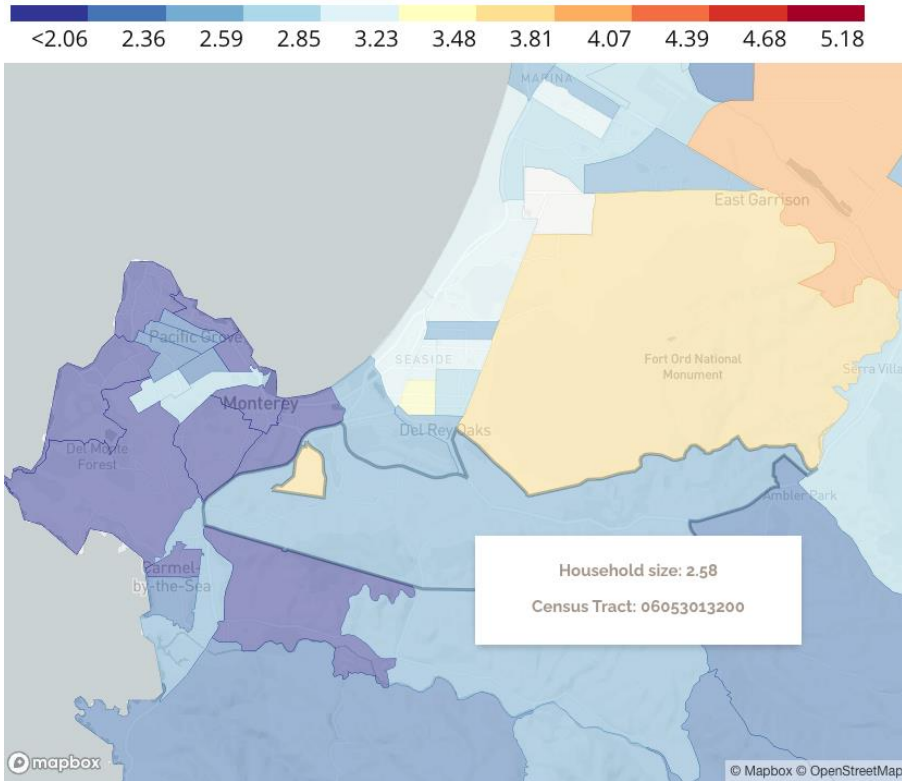
Sincerely,



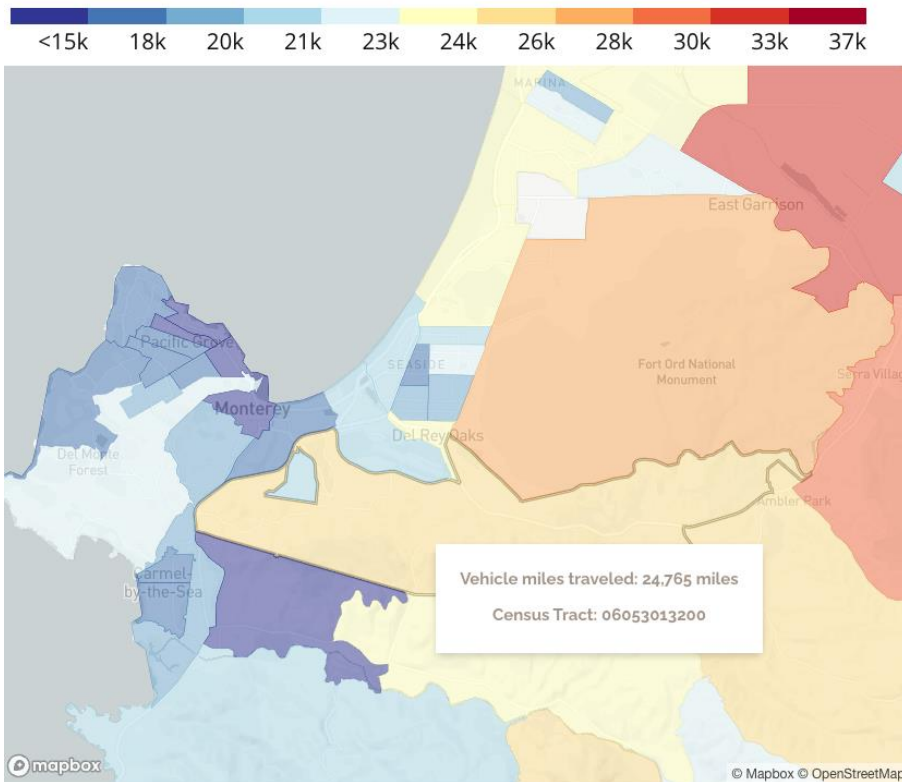
Ben Gould, MPP, MS  
President, EcoDataLab

## Attachments: Census Tract-level VMT and Household Size Maps

Data: Household size

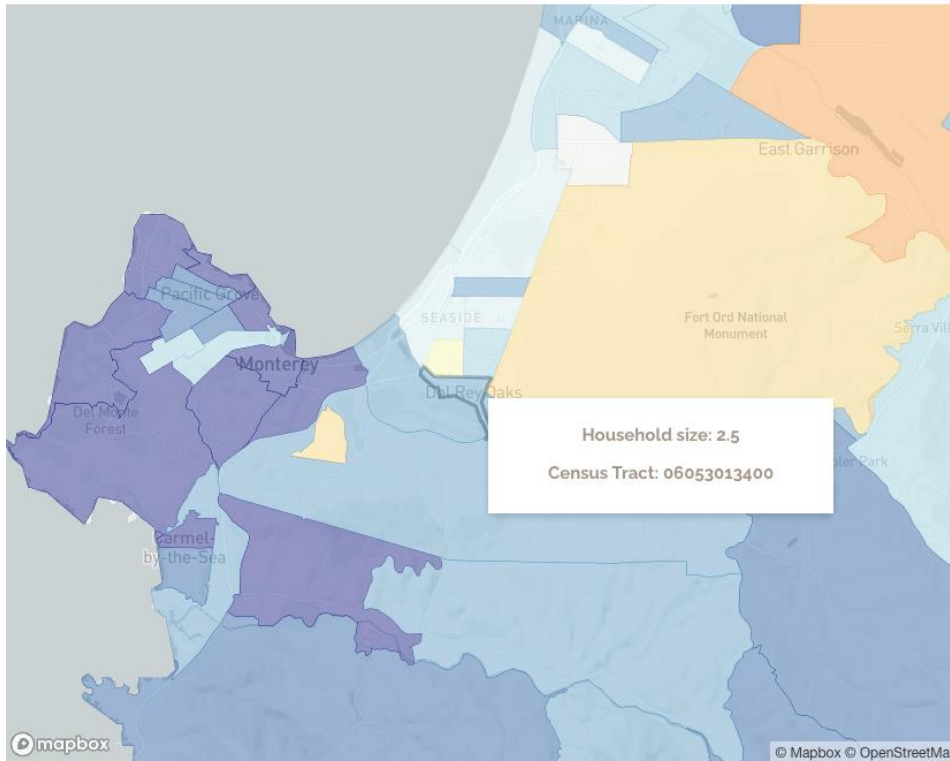


Data: Vehicle Miles Traveled (VMT) per household

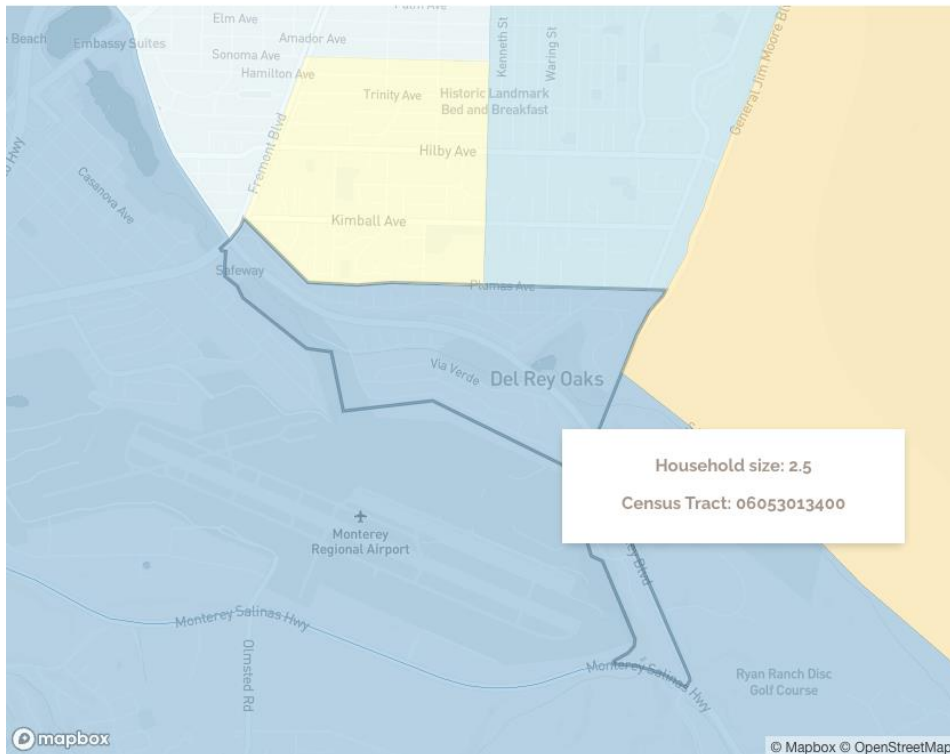




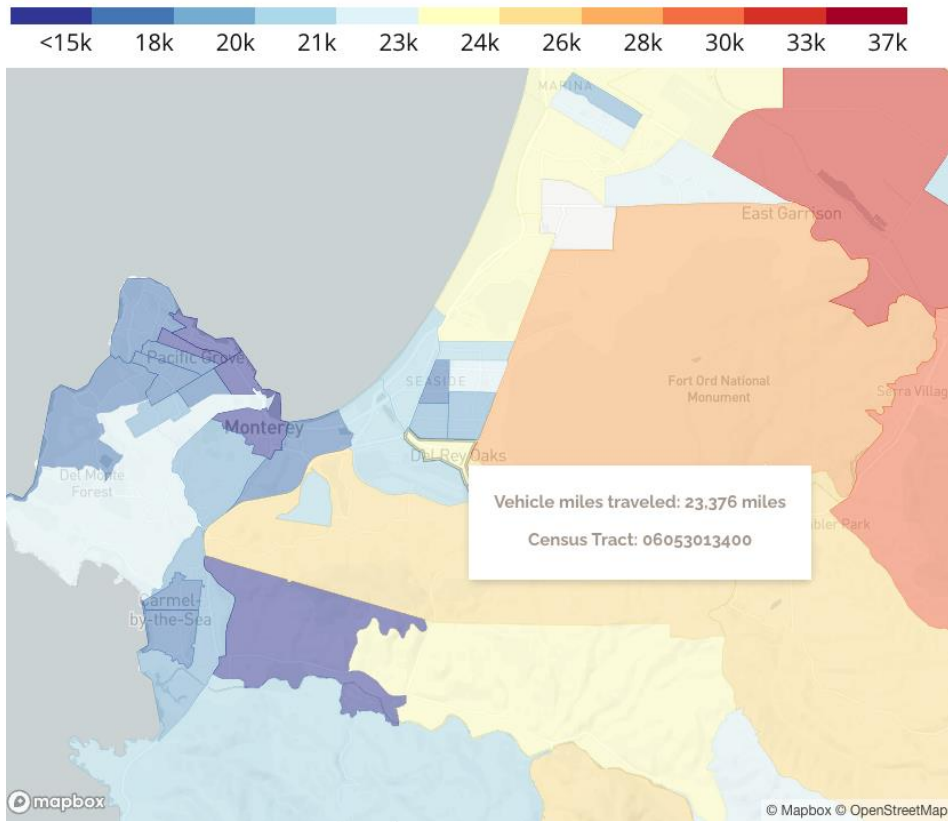
Data: Household size



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