



October 22, 2018

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SUBJECT: Monterey Peninsula Airport Master Plan Draft EIR

Dear Staff:

The purpose of the Proposed Airport Master Plan is to address Federal Aviation Administration (FAA) airport standards and to plan for projected aviation demand within a 20-year planning period, while considering safety, cost-effectiveness, and potential environmental and socioeconomic issues. The DEIR evaluates plans to meet FAA standards, airport improvements and non-aviation developments. LandWatch's comments focus on proposed non-aviation development.

### **Economic Demand Projects for Non-Aviation Development**

The DEIR proposes development of a total of 939,000 square feet of office, commercial, research and industrial uses in areas identified as South Non-Aviation, Old Industrial and North Side as follows.

South Side — 55,000 and 94,000 sq. ft.  
Old Industrial — 64,804 sq. ft.  
North Side — 400,000 and 325,000 sq. ft.  
Total — 938,804 sq. ft. (chapter 2, pp. 2-41 to 2-43)

Please justify the demand for this development in the context of the 1) already approved developments in Monterey County (see chart below from March 2016) and 2) areas that are currently zoned for office, commercial, research or industrial uses in surrounding areas.

<b>Approved and Unconstructed Non-Residential Developments</b>	15-Mar-16
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<b>Jurisdiction</b>	<b>Development</b>	<b>Commercial</b>	<b>Industrial</b>	<b>Ag Industrial</b>	<b>Office</b>	<b>Total</b>	
<b>County</b>	East Garison	75,000				75,000	
	Ro San Juan	90,000				90,000	
	Coral de Tierra Shopping	99,000				99,000	
<b>Marina</b>	The Dunes on Monterey Bay				7,600	7,600	
	Marina Station	60,000	632,000		144,000	836,000	
	Airport Busines Park		175,000			175,000	
	FOR A Business Park		43,381			43,381	
	Marina Golf Course-Hotel					0	
<b>Salinas</b>				6,438,168		6,438,168	
<b>Monterey</b>	Monterey Hotel	4,611				4,611	
	Regency Theater	3,832				3,832	
	Ocean View Plaza	125,770				125,770	
	2 Upper Ragsdale Dr				66,173	66,173	
<b>Seaside</b>	Seaside Resort					0	
	Main Gate	500,000				500,000	
		958,213	850,381	6,438,168	217,773	8,464,535	square feet

This does not include areas that are currently zoned for office, commercial, research or industrial development nor does it include such developments that have been approved since March 2016.

**Traffic and Circulation.** The DEIR finds the Proposed Project and Alternative 1 would have significant and unavoidable impacts at intersections and highway segments (Impacts TR-4 and TR-5). Impacts on future VMT are also found to be potentially significant and unavoidable. Based on the following data, the impacts are primarily due to vehicle emissions related to proposed non-aviation uses.

Net new daily 10,991 trips total (Table 4.16F). Proposed non-aviation uses total 10,832 daily trips or 98% of total trips. Daily VMT for the proposed project is an increase of 53,035 miles for the Proposed Project and Alternative 1 (Table 4.16Q). Proposed non-aviation uses total 51,763 miles or 98% of total VMT.

**Greenhouse Gas Emissions (GHG).** The DEIR finds the proposed project would generate 11,549.4 metric tons/year of CO<sub>2</sub>e<sup>1</sup> which would create a significant and unavoidable impact (Table 4.8F). Mobile source emissions are 81% of total emissions. These emissions are primarily associated with the non-aviation uses. No mitigation measures are proposed to reduce GHG emissions from mobile sources. An Alternative that reduces total square footage for non-aviation uses should be identified. See Alternative discussion below.

**Cumulative Impacts.** The DEIR defines “probable future projects” as projects with approved or pending development applications (i.e., proposed). (p. 5-3) CEQA Guidelines Section 15065(a)(3) has a broader definition which includes projects identified in General Plans.

(1) Either: (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. **Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions.** A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency. **(Emphasis added).**

A total of 1,000,000 square feet of office, research and industrial uses is designated in the FORA Base Reuse Plan. It is unclear how much square footage of similar uses is accounted for in Table 5B, Cumulative Development Projects. The addition of 930,000 square feet of non-aviation uses combined with similar development on the former Fort Ord would add significantly to cumulative traffic impacts that are identified as significant and unavoidable in the DEIR.

**Hazardous Conditions.** Portions of all three non-aviation sites would allow for a greater concentration of people than what is recommended by FAA. These concentrations are identified as Significant Hazardous Impacts (HAZ 2 to 4). Alternative 1 proposes the following mitigation measures:

- The northern part of the 3.6 acre southern parcel within Safety Zone 5 shall remain as undeveloped open space.
- Proposed non-aeronautical projects in the 4.3-acre area on the north side of the Airport within Safety Zone 3 shall not exceed the non-residential intensity maximums described in the 2011 Handbook for Safety Zone 3.
- The 9.0 acres of land in the north side within Safety Zone 2 shall only be developed with light industrial uses and/or be preserved as open space consistent with the recommendations described in the 2011 Handbook for Safety Zone 2.

These mitigation measures should be adopted regardless of what Alternative is evaluated.

**Alternatives:** The Alternatives identified in the DEIR do not meet the following CEQA requirements:

§ 21002. APPROVAL OF PROJECTS; FEASIBLE ALTERNATIVE OR MITIGATION MEASURES The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects...

15126.6. CONSIDERATION AND DISCUSSION OF ALTERNATIVES TO THE PROPOSED PROJECT. (a) Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. ...

(b) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be costlier.

(c) Selection of a range of reasonable alternatives. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects...

An Alternative that reduces square footage of the non-aviation uses would reduce traffic and GHG emission impacts significantly. As noted above, mobile source emissions of GHG are 81% of the total emissions. Proposed non-aviation uses total 98% of total trips and 98% of total VMT. A revised DEIR should address whether or not proposed buildout in the next 20 years of non-aviation uses is realistic under a cumulative impact scenario that shows an additional 1,000,000 square feet of similar uses on the Former Fort Ord. Such an Alternative would meet the project's objectives while significantly reducing traffic and climate change impacts.

Thank you for the opportunity to comment on the document.

Sincerely,

Michael DeLapa  
Executive Director