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Sabrina V. Teller
steller@rmmenvirolaw.com

August 11, 2020

Via email: mike@montereyairport.com

Mr. Michael La Pier, AAE
Executive Director
Monterey Regional Airport
200 Fred Kane Drive, Suite 200
Monterey, CA 93940

Subject: Addendum to the Final Airport Master Plan Environmental Impact Report (SCH#2105121105); BID for Monterey Peninsula Airport District Northside General Aviation Apron Construction & Northeast Vehicle Service Road Improvements

Dear Mr. La Pier:

On behalf of the City of Monterey and the City Manager for the City of Monterey, we submit the following comments on the proposed modifications to the Airport Master Plan and the addendum to the Environmental Impact Report (EIR) certified for the Master Plan. The City learned that the Airport District is moving forward with modifications to portions of the short-term program of the Airport Master Plan (AMP) and is requesting bids responsive to specifications published in the Monterey Herald on July 23, 2020. However, the proposed addendum to the Master Plan EIR that purports to analyze the environmental impacts of the project modifications was only released on Friday, August 7, 2020, just two business days before the District's August 12, 2020 meeting to consider the addendum. While CEQA does not specify a minimum period of time for soliciting comments on addenda, the District's actions seem intentionally designed to discourage and constrain any meaningful public review and do not afford the District's Board sufficient time to consider any comments on the addendum.

As the District is aware from the City's previous communications regarding the proposed project modifications (see attached April 28, 2020 letter), while the City supported the original plan (see attached October 2018 letter), the City has serious concerns about potentially significant impacts that are likely to result from the project modifications. Those concerns have not been resolved or adequately addressed in the proposed addendum.

The Significant Traffic Impacts Resulting from the Project Modifications Have Not Been Adequately Analyzed

It continues to be the City's position that the Airport's proposed change in project description to move a planned public connection from the existing east vehicle service road to Del Rey Gardens Drive from the short term to a future, long-term phase (vaguely, sometime between 11 and 20 years from now), was not adequately addressed in the previously certified EIR for the Airport Master Plan, as outlined in the City's April 28, 2020 letter to the Airport District. The proposed change could result in significant traffic impacts on the Casanova Oak Knoll ("CONA") neighborhood that were not analyzed in the EIR, nor are they adequately analyzed in the addendum that the Airport District proposes to adopt on August 12, 2020. This gap in analysis must be remedied so that potential effects to the quality of life and traffic in this neighborhood are fully considered, disclosed to the City and the public, and adequately mitigated.

As stated in the EIR for the approved Airport Master Plan:

"An in-depth traffic analysis of Alternative 2 [no "north-side" road] with the distribution of long-term traffic from the north side of the Airport through the CONA neighborhood would be required to fully determine the extent and significance of the impact. Any additional long-term traffic through CONA, however, would create Potentially Significant impacts related to the City of Monterey General Plan and CONA Neighborhood Plan goals and policies to reduce traffic and noise impacts within CONA." (Italics added.)

A Master Plan Amendment and subsequent Environmental Impact Report is necessary due to the substantial change in plans that would remove the "north side" road from the short-term program. As acknowledged in the EIR, removing or delaying the "north side" road would result in significant traffic impacts on the CONA neighborhood that would require "in-depth" analysis. But the addendum does not provide that required "in-depth" analysis. Instead, it simply punts back to the EIR's acknowledgment (but no analysis) that the impacts on the neighborhood would be significant and claims that the impact disclosure is unchanged. Since the District is now proposing, in effect, to adopt the EIR's Alternative 2, a full accounting and disclosure and mitigation for those impacts is required before the District approves the proposed modifications and authorizes any construction bids. Changes in the project and surrounding circumstances must be fully considered and analyzed pursuant to Public Resources Code section 21166 and CEQA Guidelines section 15162.

Relocation of the aircraft rescue and firefighting (ARFF) facility would be moved from Phase One of the short-term program to Phase Two. To ensure consistency with the

City's general plan and neighborhood plan policies, once relocated, the ARFF would no longer be a joint-use facility with the City of Monterey, but would be used only for on-airport emergencies. In Table 16 in Section 5.6 of the Addendum, it shows additional ADT attributed to the ARFF. But if the ARFF will only serve airport emergencies, why are there still trips through the Airport Road? Will they be relocated to the non-public access road as well?

Improvements for a northeast vehicle service road would be constructed in the short-term program (from the existing east vehicle service road to the terminus of Airport Road at the north general aviation (GA) apron); however, a proposed public connection from the existing east vehicle service road to Del Rey Gardens Drive would be moved from the short-term program to the long-term program. By moving the proposed public connection to a long-term phase (11–20 years), what assurances can the Airport provide that the road will be in place before non-aviation development occurs in the north side of the Airport in the short-term, midterm, and long-term range? Any non-aviation related development that occurs in addition to what is proposed in the short-term, will likely result in additional trips on Airport road above Existing Conditions.

Additionally, between the time that the EIR was certified and the proposed Addendum was prepared, the Airport has built a solar farm as a non-aviation-related development in the north side of the airport. The proposed Addendum does not include any traffic from the Solar Farm in Table 5.6, which would not have been included in the 2016 Existing Counts. In fact, the document completely fails to consider any changes in cumulative impacts, including how moving the public connection from the existing east vehicle service road to Del Rey Gardens Drive from the short-term scenario to the long-term may have implications for the EIR's cumulative impacts analysis.

Public access to the north side GA area would continue to occur via Airport Road in the short term. The northeast service road improvement (as described above) would provide a construction haul route and an on-airport service road to the north GA area from both sides of the Airport but would be gated and not available for public access. Given that the service road is not for public access, the City disagrees with the assumption that all construction-related traffic will be using this road. It seems more likely that construction related traffic would utilize Airport Road instead of the service road for convenience. For example, would the Airport allow for private vehicles of construction employees to utilize this road? Or would they more likely be directed to Airport Road to avoid driving along the edge of Airport Taxiways. The Addendum provides no assurances that the Airport will prevent construction traffic from utilizing Airport Road and intruding on the CONA neighborhood.

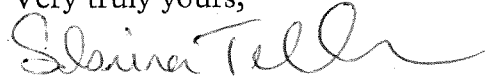
The Project Modifications Will Require the City to Construct a New Fire Station, Which Is Not Disclosed or Analyzed in the Addendum

The fire station in its current location at the Airport serves the areas of Ryan Ranch, Garden Road, Fish Flats, Deer Flats, the Highway 68 corridor, and provides automatic aid to unincorporated areas like Jocelyn Canyon. With this fire station in use at this location, those areas receive a good level of service in that the station provides a 6 minute or less response time. The project modifications include moving the shared ARFF facility to the north side and cancelling the current fire service agreement with the City. If the station is relocated and/or made to serve only the airport, those areas currently served by the shared facility would receive substandard service, with some areas having response times of 8 to 9 minutes or longer. This level of service is unacceptable for the City and thus would prompt the City to find a site upon which to construct a new station to serve those areas with a good level of service.

The impacts checklist at Appendix G to the CEQA Guidelines indicates that a lead agency should consider whether a proposed project would "result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services", including fire protection, as relevant here. The addendum does not acknowledge, let alone analyze, the fact that the project modifications would result in the need for the City to construct a new fire station to serve areas currently served by the fire station in its current location. This deficiency renders the addendum inadequate under CEQA.

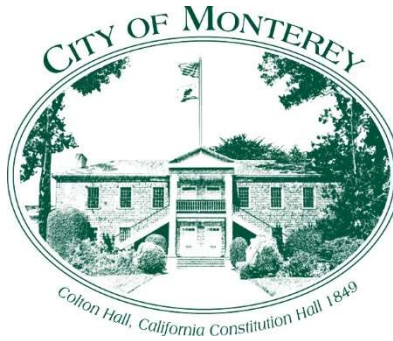
The Airport must withdraw the call for bids until it fully complies with CEQA by preparing a subsequent or supplemental EIR under Public Resources Code section 21166. Response to this call for a remedy to this CEQA violation is requested prior to the Airport's August 19, 2020 deadline for proposals.

Very truly yours,



Sabrina V. Teller

cc: Mayor City Councilmembers, City of Monterey
Hans Uslar, Monterey City Manager
Christine Davi, Monterey City Attorney



April 28, 2020

Mr. Michael La Pier
Executive Director
Monterey Regional Airport
200 Fred Kane Drive, Suite 200
Monterey, CA 93940
<planning@montereyairport.com>

Subject: Environmental Assessment for Proposed Airfield Safety Enhancement Project
for Taxiway "A" Relocation & Associated Building Relocations

Dear Mr. La Pier:

The City of Monterey appreciates the opportunity to provide comments for the Environmental Assessment (EA) associated with Monterey Airport's proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations. This EA was initiated with a scoping proposal in 2016, and reopened for public comments on March 24, 2020, with no public outreach since an Open House on December 6, 2016.

The City of Monterey understands that grant funding is associated with this project and is aware of the Airport's desire for timely FAA compliance with review of this EA. However, the project has significantly changed since the Master Plan was reviewed under the California Environmental Quality Act (CEQA) and approved. Because of these changes, the City finds that the project is no longer in compliance with the City of Monterey General Plan or the Casanova Oak Knoll Neighborhood Plan.

The alternative proposed with this EA represents a major detour from the alternative studied, reviewed, and incorporated in the recently adopted Monterey Regional Airport Master Plan. The City supported the Airport's EIR and Master Plan, which prioritized construction of a "north-side" connection road to State Route 218.

The City objects to the process for environmental review for this group of projects as it presents a significant change to the projects listed in the Master Plan and reviewed under CEQA. This hasty new alternative to omit the "north side" road was not fully evaluated for its impacts in the previous CEQA document and does not provide a thorough analysis for Aircraft Rescue and Firefighting Force and Facility (ARFF) relocation with the contextual understanding of this change. Potential negative consequences include a decrease of both fire safety and

emergency medical response times for neighborhoods along Highway 68, including Fisherman Flats and Ryan Ranch, and the introduction of regularly-occurring emergency vehicles through the Casanova Oak Knoll neighborhood.

1. Process.

The Airport appears to have strategized the sequence of environmental review instead of preparing joint documents according to the CEQA Guidelines (Sections 15220 to 15229). The bait and switch approach to address state and then federal environmental criteria will nullify the previously preferred alternative that included a “north road,” which then pushes all new north-side development and regular neighborhood-serving emergency vehicular trips onto the streets of the Casanova Oak Knoll neighborhood.

The Airport Master Plan was adopted along with a certified EIR under CEQA in 2019 with a preferred alternative that has been entirely discounted by the NEPA criteria for environmental review. If the National Environmental Policy Act (NEPA) process results in this substantial change to the Master Plan, the Monterey Airport will need to revisit and supplement its analysis under CEQA pursuant to Public Resources Code section 21166 and CEQA Guidelines section 15162. As explained further below, this change could result in new or more severe significant impacts than previously disclosed in the certified EIR, and therefore the Airport will need to consider those changes to the Master Plan again under CEQA.

2. Relocation of Aircraft Rescue and Firefighting Force and Facility (ARFF) Building.

The response area that would be served by a relocated fire station will be changed and other local fire stations will be impacted as well. Without a detailed analysis, the true impact cannot be well understood.

The site chosen for relocation of the ARFF building, on the north side of the airport will intensify traffic in the Casanova Oak Knoll neighborhood, which is inconsistent with the Neighborhood Plan policies 16, 29, and 34, as cited within this letter. Sites available on the south side of the airport have not been fully investigated and would have quicker access to Highway 68.

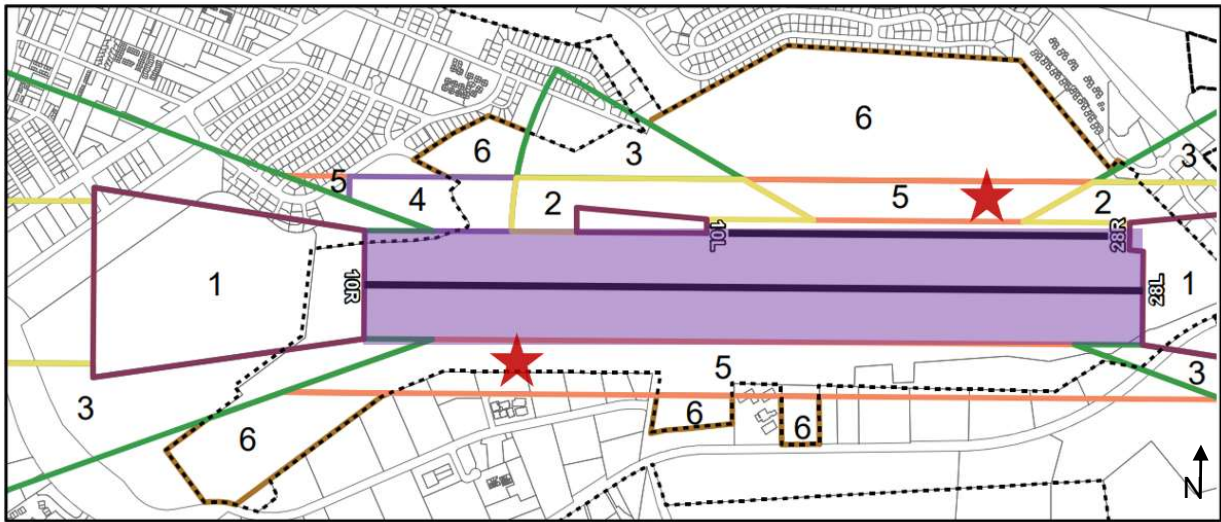
The brief assessment of potential ARFF locations is based on false assumptions. Several ARFF relocation sites available on the south side of the airport are capable of meeting Part 77 obstruction standards, which means that it must be at least 500 feet from the centerline of Runway 10R-28L.

A new ARFF building can be constructed away from the existing terminal, which would enable construction of a new south side ARFF without need for a temporary ARFF on the north side. Thus, a south side ARFF building would not be more expensive, nor less safe.

Parcel number 013221008000, owned by the Airport, has merits for relocation, yet has been overlooked as an option. The site is in close proximity to both the Airport runway and to an alternative improved roadway (Henderson Way) to access other areas in Monterey serviced by the ARFF. Current use at this location is parking for rental vehicles.

The only options for a relocated ARFF that the Airport considers with this EA is in the exact location of the current terminal, necessitating a temporary structure on the north side while the terminal is rebuilt. The possibility for ARFF to access the surrounding community via Henderson Way has not been included with this analysis, though it is included as an additional Intersection Count on page 3-41 of the EA report.

Figure 1: Stars show north and south side ARFF opportunity locations relative to safety zones, with the RPZ zone shaded in purple and Runway 10R-28L in the center.



The context of the proposed ARFF north side location and the intensity of consequences:

- Will increase response time for surrounding Monterey neighbors in High and Very High Fire Hazard areas (see Figure 2).
- Will increase response time for medical emergencies for Monterey neighborhoods along Highway 68.
- Will add non-airport emergency vehicles through the Casanova Oak Knoll neighborhood, which makes it inconsistent with Monterey General Plan and Casanova Oak Knoll Neighborhood Plan (see #3 Traffic through Casanova Oak Knoll below).

ARFF north side airport location without a “north side” road would not coincide with regional firefighting intentions because a route through North Fremont Street is less than a mile away from an existing fire station.

Figure 2: Showing north and south side ARFF opportunity locations relative to safety zones, with the RPZ zone shaded in purple and Runway, arrows showing access points.

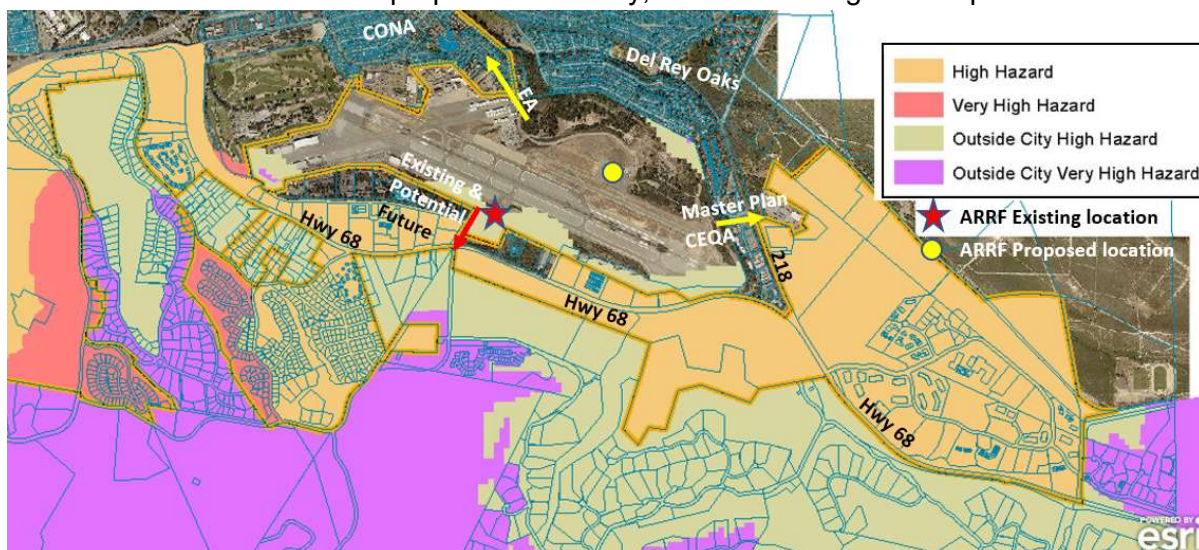


Figure 3: Showing two potential south side ARFF opportunity locations not included with the analysis in sufficient detail. Henderson Way can be an access road for community fire service.



3. Traffic through Casanova Oak Knoll Neighborhood as an alternative to SR 218.

The Monterey Airport has not exhausted all remedies to substantiate an infeasibility claim regarding construction of the previously planned “north-side” road. An application to construct a driveway connection to State Route 218 through Airport-owned Del Rey Oaks property has not apparently been proposed, rejected, nor appealed with the City of Del Rey Oaks. Whether the City of Del Rey Oaks should have police power to preclude airport connection to a state highway via a 1997 General Plan is certainly questionable. Legal analysis provided by the Airport should not constitute an infeasibility declaration, absent any attempt to actually seek project approval. The Airport has not exhausted all remedies for the environmentally superior option to construct a “north-side” road, which was preferred through the CEQA review process. Comments were received from the City of Del Rey Oaks, and the Airport made a decision in direct opposition to their concerns for a “north-side” road.

There is no formal traffic study that is attached to the EA. The Environmental Assessment heavily borrows from the Master Plan EIR, and has no formal traffic study. Although the proposed project is similar to the Existing plus Short Term Phase 1 condition from the Airport Master Plan EIR traffic study, the project description of the EA is not consistent and thus an independent assessment is needed. In Table 4H (pg 4-47) the EA states that “*the Proposed Action would result in a decrease in ADT through City of Monterey streets and neighborhoods.*” There is no evidence in the EA which supports this assessment, as no estimation of net new project trips is included.

Additionally, the EA does not acknowledge the significant and unavoidable impacts that were identified in similar conditions in the Master Plan EIR. To the extent that the EA is simply relying on the Airport Master Plan EIR, the following are traffic-specific comments from our Traffic Engineering Staff, in regards to the Airport Master Plan EIR:

- a) In the executive summary, Transportation Demand Management (TDM) strategies were identified as potentially feasible to reduce trips, but no estimation of Trip/VMT reduction based on suggested TDM strategies is provided, and it is unclear how this applies to various phases. It is also not stated how TDM would be implemented.
- b) Trip Assignment – Currently, assignment sends all traffic to Airport and N Fremont. City staff disagrees with assignment of trips, there will be diversion to Casanova Ave (secondary) and Ramona Ave (tertiary). This is supported by the neighborhood assessment in Table 4 of the Traffic Study which they identify airport related traffic on Casanova Ave and Ramona Ave.
- c) The split of airport travel was 56% to Airport Rd, 29% to Casanova Ave and 15% to Ramona Ave. Given the split of distribution of airport travel it is unclear why the intersection of Casanova and North Fremont and intersection of Ramona and North Fremont were not included as study intersection.
- d) The increase trips identified to the CONA neighborhood is 72 Daily vehicle trips, 8 AM vehicle trips and 16 PM vehicle trips (without North-South Rd). If trips are re-allocated from southside on Olmstead to Airport Rd in CONA at Int #4 (Airport/N Fremont) there should be 8 AM Trips, Figure 14 shows 9 AM Trips.
- e) For the intersection of Del Monte and SR 218, the mitigation includes an additional left turn lane on Del Monte Ave. It is unclear what the nexus of this improvement is considering that the trip assignment shows additional trips to the through movements only, in this scenario. Also, there is insufficient right-of-way to accommodate a left lane and it would reduce open space/park area in a coastal zone.
- f) For the intersection of Fremont Blvd and SR 218, the mitigation includes an additional left turn lane. It is unclear what the nexus of this improvement is considering that the

trip assignment shows additional trips to the through movements only to Highway 218, in this scenario. There is insufficient right-of-way to accommodate this improvement, and it additionally contradicts the alignment proposed in the FORTAG project.

- g) In section, 4.1.9. Proposed Short-Term – Construction Impacts, truck trips are of highest concern for quality of life impacts by residents and their construction estimate has four trucks per hour on local residential roads, which is inconsistent with the City's General Plan and Casanova Oak Knoll Neighborhood Plan, as cited in sections of this letter below.
- h) If North Side Rd is not built, based on the trip generation referenced in the document, the traffic increase in CONA area would be 6,933 vehicle trips per day, including 990 vehicle trips in the AM Peak and 963 vehicle trips in the PM Peak.

With the EA's revised project description, the relocated GA area and ARFF building would be accessed by the existing Airport Road on the northwest side of the Airport for all public access. Assumptions built into the analysis do not take into consideration the impact of regular-occurring neighborhood-serving emergency vehicles.

The City challenges some of the traffic analysis assumptions and how they relate to or are consistent with the City of Monterey regulations. It is important to note that the traffic projected on Airport Road is not only aviation-related. For context, the report states:

"On average, about 23 percent of the traffic within the Casanova Oak Knoll neighborhood is attributable to the businesses on the Airport. The airport property on Airport Road south of Euclid Avenue is occupied by non-aviation facilities that provide a revenue stream to the Airport. The businesses in this area include self-storage, U-Haul, and automotive services. The weekday ADT on Airport Road south of Euclid Avenue was 1,349 vehicles per day."

The Airport states within the Environmental Assessment that reduction in average daily trips (ADT) is anticipated to be offset with termination of leases for RV storage. Nothing is remarked within the EA about an intention to discontinue any service other than discontinuing RV storage. It is unclear whether this applies to both direct leases and sub-leasing with the City of Del Rey Oaks for RV storage. Land use decisions at the Airport are not regulated by any outside agency. There is no oversight for what types of businesses the Airport may lease to, which affects traffic through Monterey neighborhood streets. For instance, an existing hangar at the Airport is being used as music venue, which when relocated to the north side and accessed via Airport Road, has a very different impact than flight-only use.

The City notes that traffic rates for RV storage were taken in September 2019, holiday-travel season, while the comparative counts were collected during the home-holiday season in

November and December, 2016 (see Figure 4). More significantly, the amount and type of anticipated traffic anticipated to be related to the ARFF is not clearly represented in this table.

Figure 4: Table 4Q in EA

TABLE 4Q			
Net Change in Average Daily Trips (ADT)			
North Side via Airport Road			
Land Use	Trip Generation Rate (Weekday)	New Weekday ADT	ADT Including Weekend
Relocated GA Hangars (44 units)	1.41/unit ¹	62	59
Relocated ARFF Building	N/A	20 ²	20
New GA Hangars (7 units)	1.41/unit ¹	10	10
Subtotal (New ADT)		92	89
Less Month-to-Month Storage	N/A	122 ³	100
Net Change in ADT		-30	-11
Source: Mott MacDonald 2019; KHA 2019			
GA = General Aviation; ARFF = aircraft rescue and firefighting; N/A = not applicable (see Notes 2 and 3)			
Notes:			
1. Trip generation rates for hangars based on gate counts at Monterey Regional Airport (November 1 – December 31, 2016).			
2. Trips generated by ARFF based on Monterey Fire Department staffing, schedule, and incident reports (November 1 – December 31, 2016). This number would be less if structural fire support is no longer provided by the relocated ARFF.			
3. Trip generation for leased landscaping storage operations based on tube counts at Monterey Regional Airport (September 21 – 27, 2019).			

Due to the fact that the Environmental Assessment provides no formal Traffic Study independent of the Monterey Airport EIR, the EA does not include a breakdown of Project Trip Generation, which is needed to fully understand the likely effect on the neighborhood.

Regular-occurring emergency access through the Casanova Oak Knoll neighborhood into the future is unacceptable as it is inconsistent with both the Casanova Oak Knoll Neighborhood Plan and the City of Monterey's General Plan.

Following are excerpts from City of Monterey Regulations:

Casanova Oak Knoll Neighborhood Plan:

Policy 16: Improve traffic flow and safety along Airport Road.

Inconsistent. *The Proposed Action would result in an increase in large emergency vehicles through City of Monterey streets and neighborhoods.*

Policy 29. Airport Road should not be used as an access road for further development of the area at the north side of the Airport. It should be used by the Airport only as an emergency or service road.

Inconsistent. *The Proposed Action introduces a non-aviation use on the north side of the Airport with the ARFF. This project changes use of the existing service road to a regular-occurring access road. With a shared-fire contract in place and access only through Airport Road, the regular-occurring emergency vehicles would exceed the rare*

exception intended with the exception for this policy for rare emergencies occurring at the airport.

Policy 34: Oppose the use of neighborhood residential streets by automobile and truck traffic going to and from the Airport and businesses on the Airport property.

Inconsistent. The Proposed Action introduces firefighting and emergency vehicles on neighborhood residential streets going to and from the airport, resulting in a net increase of intensity of vehicular use of Casanova Oak Knoll streets that the neighborhood is expected to endure.

Monterey City General Plan:

b. Transportation and Land Use

Policy b.5. Do not support non-aviation uses within the Monterey Peninsula Airport District that create unnecessary traffic impacts in adjacent residential neighborhoods.

Inconsistent. The Proposed Action introduces firefighting and emergency vehicles on neighborhood residential streets going to and from the airport, resulting in a net increase of intensity of vehicular use of Casanova Oak Knoll streets that the neighborhood is expected to endure. Furthermore, response times will be reduced to high fire hazard zones because access is not provided to Highway 68.

c. Roads

Policy c.8. Minimize traffic impacts in residential neighborhoods by routing truck and through traffic onto highways and arterial streets, even where such routing is not the shortest distance between two points.

Inconsistent. The Proposed Action introduces firefighting and emergency vehicles on neighborhood residential streets going to and from the airport, resulting in a net increase of intensity of vehicular use of Casanova Oak Knoll streets that the neighborhood is expected to endure. The consequences that the residential Casanova Oak Knoll community would have to endure could have a high intensity.

i. Rail and Air Transportation

Policy i.6. Balance the community's need for air transportation service with community safety and environmental needs.

Inconsistent. The Proposed Action would increase traffic for relocated hangars through the Casanova Oak Knoll neighborhood without a "north-side road."

Policy i.7. Direct vehicular traffic generated by airport land uses to arterial streets and highways and away from residential neighborhoods.

Inconsistent. The Proposed Action does nothing to direct vehicular traffic to arterial streets and highways and away from residential neighborhoods. Instead, the Proposed Action introduces firefighting and emergency vehicles on neighborhood residential streets going to and from the airport, resulting in a net increase of intensity of vehicular use of Casanova Oak Knoll streets that the neighborhood is expected to endure.

Program i.7.1. Work with the Airport District to implement alternatives to the use of Airport Road as an access road for non-aviation uses on the Airport grounds.

Inconsistent. *The Proposed Action has not included collaboration with City Officials to determine a preferred ARFF relocation.*

Policy j.2. Require an analysis of the effects on the transportation network for projects that may cause significant traffic impacts, as defined by the established multi-modal LOS and automobile LOS and identify appropriate mitigation measures.

Inconsistent. *The Proposed Action has not included appropriate analysis of the effects on the transportation network for projects that may cause significant traffic impacts, nor have adequate mitigation measures been proposed for review. The Environmental Assessment heavily borrows from the Master Plan EIR, and has no formal traffic study. The CEQA EIR included language that recognized further analysis would be necessary if Alternative 2 would be pursued. As is stated in the Environmental Impact Report for the Master Plan: "An in-depth traffic analysis of Alternative 2 [no "north-side" road] with the distribution of long-term traffic from the north side of the Airport through the CONA neighborhood would be required to fully determine the extent and significance of the impact. Any additional long-term traffic through CONA, however, would create Potentially Significant impacts related to the City of Monterey General Plan and CONA Neighborhood Plan goals and policies to reduce traffic and noise impacts within CONA."*

Safety Element, Goal d: Minimize the loss of life and property from fire.

Inconsistent. *By eliminating the access road through Del Rey Oaks, there will be reduced access to high and very high fire hazard zones and increased response times.*

The City's preferred alternative continues to be Alternative D: Easterly Connection via Del Rey Gardens Drive, as discussed within the EA:

"This alternative would provide a new public road via Del Rey Gardens Drive to Highway 218. Although the steep terrain would require a significant level of design and engineering, this alternative would require less earth movement than either of the other two east side alternatives (Alternatives B or E). No building relocations would be necessary and the connection with Del Rey Gardens Drive goes through a light industrial area instead of residential neighborhoods (which would occur with the west side alternatives discussed below). Preliminary engineering estimates indicate that a series of four retaining walls would be necessary on specific sections of the road, and approximately 47,000 additional cubic yards (cy) of material would need to be removed and reused at the north side GA area or stockpiled."

With the Airport's purchase of parcel # 012601023000, please explain why this site doesn't have implicit rights of access to the nearest public street.

Figure 5: Aerial map of Airport property in Del Rey Oaks



There also appear to other alternatives that maintain access for emergency services to regional roadways such as Henderson Way and other opportunities to connect to Highway 68. Emergency access to regional roadways is imperative to maintain for the public's health and safety.

4. Confirmation requests.

- Please confirm whether construction vehicles will access the north side of the airport via the improved NE service road, only, which is also called the construction haul route; Further, please confirm that none of this traffic will access the airport via Airport Road. The airport states that construction traffic will utilize the Airport Circle in place of Airport Road. The City is skeptical of the assumption that construction traffic would use the inconvenient and circuitous Airport Circle and cut through airport runway/taxiway in place of Airport Rd, unless extensive improvements are made to Airport Circle. These additional trips from construction should be included in a full assessment of neighborhood impacts.
- A Table titled "Airport Road Related Traffic" was distributed through the media and includes mention of a proposed traffic reduction related to an existing towing service ADT, though nowhere in the EA is this discussed. Please clarify.
- Confirmation that fueling will be ushered to the tanks via Olmsted Road and not via Airport Road.
- There is an internal inconsistency in that one location states an intention for "a total replacement of the 126,000 sf of GA facilities," while another location reads that there will be "a net increase in total hangar space of 70,000 sf." Please clarify. If an increase is anticipated, then this project is inconsistent with additional City General Plan Policy b.5. "Do not support non-aviation uses within the Monterey Peninsula Airport District that create unnecessary traffic impacts in adjacent residential neighborhoods."

5. Subsequent review under CEQA.

Subsequent review under CEQA is necessary with this substantial change in plans to remove the “north side” road along with a Master Plan amendment. these changes in the project and surrounding circumstances must be fully considered and analyzed pursuant to Public Resources Code section 21166 and CEQA Guidelines section 15162. Given the potentially significant effects arising from increased traffic in locations and neighborhoods not previously anticipated and the several land use plan inconsistencies identified in this letter, it does not seem likely that such changes can be adequately or legally addressed with simply an addendum to the previously certified EIR.

As is stated in the Environmental Impact Report for the Master Plan:

“An in-depth traffic analysis of Alternative 2 [no “north-side” road] with the distribution of long-term traffic from the north side of the Airport through the CONA neighborhood would be required to fully determine the extent and significance of the impact. Any additional long-term traffic through CONA, however, would create Potentially Significant impacts related to the City of Monterey General Plan and CONA Neighborhood Plan goals and policies to reduce traffic and noise impacts within CONA.”

An in-depth traffic analysis should take into consideration the following points:

- a) Several assumptions in the prior EIR are out of date or overlapping, is the background conditions assumptions. The 2004 Dunes Traffic Impact Analysis is out of date, land uses, remaining trips and timeline of improvements have changed significantly
- b) The document does not address the potential impact to the intersections of North Fremont/Airport, North Fremont/Ramona, North Fremont/Casanova if North Side Rd is not built. If it is a possibility that North Side Road is not constructed, the Airport will need to address the resulting impacts to intersections and neighborhood streets and identify feasible mitigation.
- c) Casanova, Ramona, and Airport Rd are classified by Caltrans in the California Road Map System as major collectors; however, they were designed to the level of minor collectors/local roads. This speaks to the character of the roadways as primarily residential and having many access points from residential driveways.
- d) A table should be provided which illustrates the breakdown of Project trips including: existing Trip Credits, proposed re-location of GA hangers, additional GA hangers, trips from the re-located ARFF and the net new trips to CONA in order to understand neighborhood impacts, including clarification on how construction traffic will not intrude on the neighborhood.

With this Environmental Assessment, the Monterey Airport failed to rigorously explore all reasonable alternatives. Opportunities for the ARFF building to be relocated on the south side of the airport were arbitrarily eliminated from detailed study. Substantial treatment should be

devoted to south side options, so that the project may be found consistent with the City of Monterey General Plan. City objections are summarized in the table found with Figure 6.

Figure 6: Table summary of City of Monterey response to conclusions made with this EA:

National Environmental Policy Act (NEPA) Criteria	Road Option A: Airport Road	Road Option D: Del Rey Gardens Drive	South side ARFF	North side ARFF
1. adverse impact on airport operations	LOW	LOW	HIGH ARFF relocation does not have to be at present terminal location	LOW
2. Require substantial amounts of earthwork	LOW	MODERATE	LOW	LOW
3. substantially higher costs	LOW	MODERATE	HIGH Temporary ARFF is not necessary	MODERATE
4. Be inconsistent with the land use plans of public agencies	LOW Inconsistent with Monterey General Plan & CONA Plan	HIGH Judicial review of “infeasibility” has not been provided	n/a This location is consistent with Monterey General Plan	n/a Safety & noise impacts for ARFF not considered


The elimination of the roadway through the Del Rey Oaks industrial area is a significant issue for our community and future fire safety. The City believes that further environmental analysis under CEQA’s subsequent review provisions is required as a next step for this project.

It is the City’s position that the Environmental Assessment does not properly address City concerns about Transportation and Traffic in the Casanova Oak Knoll neighborhood. There is a gap in analysis that must be remedied so that potential effects to the quality of life to the neighborhood are considered, disclosed to the City and the public, and adequately mitigated.

The City of Monterey respectfully requests the FAA delay a Finding of No Significant Impact (FONSI) decision until a more robust and collaborative analysis is made for the ARFF relocation. If that is not the chosen course of action, then the City requests that the FONSI be mitigated to only allow an ARFF on the north side of the airport if it is self-contained and does not answer daily calls to jurisdictions other than the Monterey Airport District.

Please accept the attached group of 30 comments from Monterey residents as inclusive with this City letter. Future correspondence is requested. For all future proposed airport projects, consider this a request for notice and send that information via the email addresses provided.

Sincerely,

DocuSigned by:

FA1981217DEE4FB...

Clyde Roberson
Mayor

c: City of Monterey Council Members
Hans Uslar, City Manager
Nat Rojanasathira, Assistant City Manager
Christine Davi, City Attorney
Kim Cole, Community Development Director
Ande Flower, Principal Planner
Richard Ruccello, Casanova Oak Knoll Neighborhood Assoc. President
Robert Yoha, Casanova Oak Knoll Neighborhood Assoc. V-P, Airport Liaison
Chris Morello, Senior Planning Manager of Development & Environment

File



October 16, 2018

Mr. Michael La Pier, AAE
Executive Director
Monterey Regional Airport
200 Fred Kane Drive, Suite 200
Monterey, CA 93940

Subject: Draft Environmental Impact Report for Proposed Airport Master Plan

Dear Mr. La Pier:

The City of Monterey appreciates the opportunity to provide comments to the Draft Environmental Impact Report (DEIR) associated with the proposed Airport Master Plan. The City of Monterey (City) understands and supports the Airport's efforts to implement improvements that will enable Monterey Regional Airport to accommodate safe air travel responsive to future demand with resiliency. However, the City of Monterey does not support the Project as proposed (Proposed Project).

Instead, the City supports the Environmentally Superior Alternative 1 Project (with some amendments) because it is more consistent with Monterey General Plan and Casanova/Oak Knoll Neighborhood Plan goals and policies. The DEIR concludes that the Alternative 1 Project approach to the Airport Master Plan reduces environmental impacts, retains all the major projects of the Proposed Project, and meets all four Project Objectives:

- Enhance Airport Safety
- Prepare for Future Aviation Demand
- Incorporate Airport Sustainability Goals
- Increase Airport Self-Sufficiency.

Little to no argument can be found within the DEIR that would support the Proposed Project as preferable to the Alternative 1 Project approach.

Monterey residents in the Casanova Oak Knoll (CONA) neighborhood have expressed concern about how the Airport District has adhered to CEQA noticing requirements found within Guideline §15087. Please provide evidence that the Airport has followed CEQA procedures for notifying the public that the DEIR has been available for public comment. The City of Monterey respectfully submits the following comments as it relates to the proposed improvements in conjunction with the Airport Master Plan Project:

1. Responsible Agency

The City of Monterey should be recognized as a Responsible Agency because it is a public agency with discretionary approval power over the project. Three parcels within the City are included within the proposed Master Plan: 013321009000, 013221015000, and 013222008000. The proposed primary use for the first two parcels cited is vehicular parking (either lot or structure), which is not consistent with allowed or conditional uses in the Industrial zone (I-R). The project may trigger amendments to the City's regulations in order to proceed as planned.

2. "North Side" Road

The City of Monterey supports the Alternative 1 Project prioritization to develop the "north side" road connection to Del Rey Oaks.

The City requests that the "north side" road be the first project constructed so construction traffic can be eliminated through the Casanova Oak Knoll (CONA) neighborhood. Otherwise, there are significant unavoidable impacts of construction traffic through a single family a residential neighborhood. By constructing the "north side" road as part of the initial project, all construction vehicles and new trips to the redeveloped north side of the Airport will approach the Airport via State Highway 218 instead of through residential roads in the CONA neighborhood.

In contrast, the City does not support the Proposed Project approach because it would add construction-related vehicular trips, as well as trips to the redeveloped north side of the Airport, to intersections and road segments that have been identified as operating deficiently during the peak commute hours under existing conditions. The DEIR is also deficient in the following respects:

- The Proposed Project approach relegates construction of the "north side" road to an unanticipated date following all other improvements.
- Construction traffic impact. As a result, project-construction traffic impacts would be significant and unavoidable. Proposed mitigation related to the Proposed Project is focused on a reduction of allowed operation for truck hauling to not occur during the hours of 7:00 to 9:00 a.m. and 4:00 to 6:00 p.m., Monday through Friday. Implementation and enforcement of such mitigation is problematic and not likely to be ameliorative.
- General Aviation Hanger traffic impact. Airport improvements include relocating 44 General Aviation Hangers to the north side of the airport. Without building the "north side" road first, this would result in a significant increase in vehicular traffic in the CONA neighborhood to the detriment of the residents and is inconsistent with the City of Monterey General Plan and CONA Neighborhood Plan.

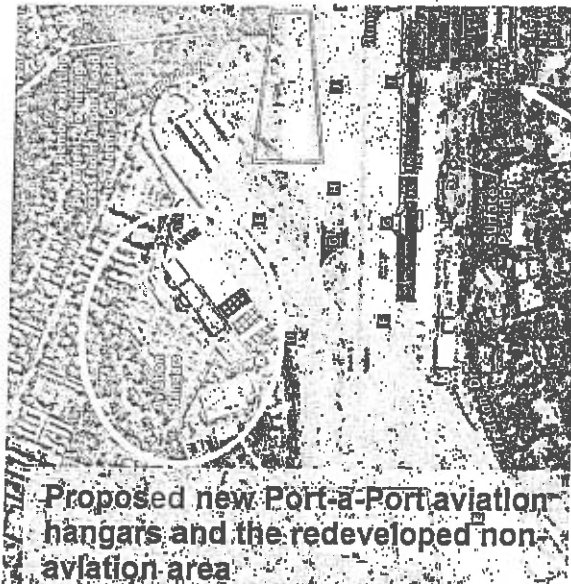
3. Internally Inconsistent

It is unclear how the Traffic Analysis Report can be correct that traffic related to the proposed Port-a-Port aviation hangars and the northwest redeveloped non-aviation uses can access the "north side" road beyond the "no-through access" double dead-end break in roadway.

If access to "north side" road is not available to the proposed Port-a-Port aviation hangars and the northwest redeveloped non-aviation uses, then the following DEIR excerpted assessment does not reflect this and the City would not support it because it would be inconsistent with stated City goals and policies that are listed below. Additional information is necessary before the City can confidently comment on the Traffic Analysis Report regarding the northwest corner of the Airport Master Plan.

Following is excerpted from the DEIR Traffic Analysis Report:

Alternative 1: The 7 new Port-a-Port T-Hangars and the Navy Flying Club Hangar are already located on the north side of the Airport. Under this alternative, they would be relocated from their current location but would still be on the north side of the Airport. However, the construction of the North Side Road would mean traffic generated by the Port-a-Port T-Hangars and the Navy Flying Club would be redistributed to the north side of the Airport via the North Side Road from Highway 218 and Del Rey Gardens Drive instead of Airport Road through the CONA neighborhood.



Full image can be found on the last page of this letter.

Any plan that allows for Airport traffic through the CONA neighborhood via Airport Road is inconsistent with the Monterey General Plan and CONA Neighborhood Plan. Any Alternative of the Master Plan that would have this effect is not supported by the City of Monterey.

Following are excerpts of the City of Monterey policies:

Monterey General Plan Circulation Element

- Policy b-5. Do not support non-aviation uses within the Monterey Peninsula Airport District that create unnecessary traffic impacts in adjacent residential neighborhoods.
- Policy c.8. Minimize truck traffic in residential neighborhoods by routing truck and through traffic onto highways and arterial streets, even where such routing is not the shortest distance between two points.
- Policy i.7. Direct vehicular traffic generated by airport land uses to arterial streets and highways and away from residential neighborhoods.

- Program j.7.1. Work with the Airport District to implement alternatives to the use of Airport Road as an access road for non-aviation uses on the Airport grounds.
- CONA Neighborhood Plan
 - Policy 29: Airport Road should not be used as an access road for further development of the area at the north side of the Airport.
 - Policy 34: Oppose the use of neighborhood residential street by automobile and truck traffic going to and from the Airport and businesses on the Airport property.
 - Program 34c: Oppose the use of Airport Road and Casanova Avenue by construction traffic during development of the north side of the Airport and by business traffic after development is completed.

4. Aircraft Rescue and Firefighting Force and Facility (ARFF)

In the case of an emergency, vehicle access to and from the north side of the airport is currently limited to Airport Road and will remain so until the "north side" road is constructed. The City of Monterey supports Alternative 1 approach because the "north side" road would be built in the first phase of development.

- Alternative 1. As reported within the DEIR, if a north side ARFF facility was to respond to a call east of the Airport via the proposed "north side" road, response times are estimated to be approximately eight minutes faster than the response time from the existing ARFF building.
- Proposed Project. A permanent ARFF building would be built where the terminal currently exists, only after a temporary ARFF building would be located north of the airfield. A new service road would be constructed for the temporary building, which would connect to Airport Road west to North Fremont Street. This would increase traffic on Airport Road through the adjacent residential neighborhood for at least 10 years. This would have unavoidable and significant impacts that are inconsistent with City of Monterey General Plan and CONA Neighborhood Plan.

5. Fuel depot

The City requested environmental investigation regarding locating a new large fuel depot on the north side of the airport with a prior comment letter. Environmental analysis of the following questions raised during the earlier comment period does not appear to be included with the DEIR: What will be the fuel delivery route to the tanks? What are the increased hazards to the adjacent Casanova/Oak Knoll neighborhood?

6. Frontage Road

The City supports Alternative 1 cul-de-sac, which has removed the Proposed Project loop road within the Highway 68 frontage and has replaced proposed terminal parking garage with a surface parking lot, because it would reduce vegetation removal and reduce environmental impacts to the scenic highway.


7. Vegetation Removal Impacts

The DEIR states that with Alternative 1 approach, the "Project Sponsor shall coordinate with the City Forester to determine an appropriate in-lieu fee for the replacement of 67 coast live trees, 164 Monterey pine trees, 17 Monterey cypress trees, and four golden wattle trees that would be removed as such mitigation will be required with the City of

Monterey permitting process for the Highway 68 frontage road cul-de-sac and associated terminal area parking and circulation components." In lieu fees for tree re-planting mitigation is an option only available at the discretion of the City Urban Forester and is typically not the preferred mitigation option. Therefore, the City requests further study into alternative mitigation opportunities for canopy replacement. Typically, tree replacement would occur on-site.

The Alternative 1 approach to project goals is responsive to several of the comments and concerns that the City of Monterey has communicated with Airport staff through their process of developing the Draft Master Plan. The City values participation with this process and strongly recommends moving forward with the Environmentally Superior Alternative 1 with a few amendments addressed above.

Sincerely,



Clyde Roberson, Mayor

C: City of Monterey City Council Members
 Hans Uslar, City Manager
 Bonnie Gawf, Interim Assistant City Manager
 Chrissy Davi, City Attorney
 Kim Cole, Community Development Director
 Ande Flower, Principal Planner
 Richard Ruccello, Casanova Oak Knoll Neighborhood Assoc. President

