MONTEREY
REGIONAL AIRPORT

Chapter Six

OTHER REQUIRED CEQA SECTIONS

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Pursuant to Sections 15130 and 15126.2 of the *California Environmental Quality Act* (CEQA) Guidelines, this chapter identifies significant environmental effects which cannot be avoided if the Proposed Project or Alternative 1 is implemented. It also describes significant irreversible changes that could occur and the potential for growth inducement. The discussion in this chapter is a summary of the in-depth analysis provided in Chapters Four and Five of this Environmental Impact Report (EIR). Additional information can, thus, be found in those chapters.

6.1 UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL EFFECTS

Proposed Project

The Proposed Project would result in Significant and Unavoidable effects with respect to:

- Potentially significant impacts to the scenic resources of Highway 68 due to grading and tree removal during construction of the proposed Highway 68 frontage road, south side drainage improvements, and long-term non-aeronautical development (Impact AES-1);

- Aesthetic impacts related to the proposed commercial terminal complex parking garage, the scale of which would be bigger than other existing buildings located a similar distance from Highway 68 (Impact AES-3);

- Potentially unmitigable impacts to Monterey pine trees *(Pinus radiata)*/Monterey pine forest, a California Native Plant Society (CNPS) Rank 1B.1 plant and Sensitive Natural Community (Impacts BIO-4, BIO-20, BIO-28, and BIO-34) (323 trees and 5.27 acres in the short term; unknown in the long term);

- Potentially unmitigable impacts to Yadon's piperia (*Piperia yadonii)*, a federal endangered plant (Impacts BIO-9 and BIO-25) (460 individuals in the short term; unknown in the long term);

- Future greenhouse gas (GHG) emissions above 2015 levels (a projected long-term increase of 15,191.7 metric tons/year (CO_2e[1]) (Impact GHG-1);

- A decline in off-airport emergency response times in the short term (i.e., until a new "north side" road is constructed) (Impact HAZ-5);

- Inconsistencies with *General Plan Update for the City of Del Rey Oaks* (City of Del Rey Oaks 1997), Policies C-3 and 13 related to anticipated traffic impacts if proposed mitigation proves infeasible (Impact LU-1);

- Inconsistency with *General Plan Update for the City of Del Rey Oaks,* Policy C-17 related to the proposed "north side" road (Impact LU-2);

- Inconsistency with *City of Monterey General Plan* (City of Monterey 2016), Policy b.4 of its Noise Element, which states, "Support limiting the number of fixed-base general aviation aircraft at the airport to the existing number." (Impact LU-3);

- Inconsistency with *City of Monterey General Plan*, Goal j, Policy j.2, and Programs j.1.1 and j.2.3 of its Circulation Element, which establish level of service (LOS D) as an acceptable automobile LOS standard for roadway segments that are not within a multi-modal corridor and require a traffic analysis to determine appropriate mitigation and the funding of a pro-rata share toward improvements if proposed mitigation proves infeasible (Impact LU-4);

- Inconsistency with *Casanova-Oak Knoll Neighborhood Plan* (CONA Neighborhood Plan) (City of Monterey 1985) goals and policies (Public Works Policies 15 and 16, and Airport Noise Policies 29, 34, and Program 34b) related to restricting the use of Airport Road for airport-related uses in the short term until the proposed "north side" road is constructed (Impact LU-5);

- Inconsistency with CONA Neighborhood Plan, Airport Noise Policy 34, which states that the neighborhood is opposed to the use of neighborhood residential streets by automobile and truck traffic going to and from the Airport and businesses on the Airport property as Airport Road would remain in use for existing or replacement airport land uses located west of Gate V22 (Impact LU-6);

- Inconsistencies with CONA Neighborhood Plan, Noise Goals 2, 3, and 4 (Impact LU-7) (see Impact NOI-1 and NOI-2 below);

[1] Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2e) and is the amount of a GHG emitted multiplied by its GWP.

- Inconsistency with *Comprehensive Land Use Plan for Monterey Peninsula Airport*[2] (CLUP) (County of Monterey 1997) until the airport land use commission (ALUC) updates the CLUP consistent with the Proposed Project or Alternative 1 (Impact LU-8);

- One additional residence within the Airport's 65-70 CNEL 2025 noise contour based on the Federal Aviation Administration (FAA)-approved operational forecasts (although this residence has been sound-attenuated for interior noise impacts) (Impact NOI-1);

- Four additional residences within the Airport's 65-70 CNEL 2035 noise contour based on the FAA-approved operational forecasts (although these residences have been sound-attenuated for interior noise impacts) (Impact NOI-2);

- Reduced aircraft rescue and firefighting (ARFF) response times to areas off-airport below the recommended five-minute response time until the ARFF facility is permanently located on the south side or until the proposed "north side" road is constructed (Impact PS-1);

- Contributing project-related peak hour trips to five intersections located along Highway 68 or Highway 218 that are currently operating at unacceptable levels of service (Impact TR-1);

- Contributing project-related peak hour trips in the long term to intersections and highway segments that are projected to operate deficiently under future conditions (Impact TR-2);

- Future impacts related to increases in vehicle miles traveled (VMT), which are unknown and speculative at this time (Impact TR-7); and

- The following cumulative impacts as discussed in Chapter Five (see Section 5.6):

  - Impacts to the scenic viewshed and resources of Highway 68;

  - Additional criteria pollutants;

  - Yadon's piperia, sandmat manzanita (*Arctostaphylos pumila*), Monterey spineflower *(Chorizanthe pungens)*, coast live oak (*Quercus agrifolia*), and Monterey pine experience loss and ongoing pressure from cumulative development, including loss of habitat and habitat fragmentation, erosion/sedimentation, manmade intrusions, such as light, noise, and overall activity, and the introduction of non-native invasive species;

  - Additional GHG emissions;

  - Policy inconsistencies with the cities of Del Rey Oaks and Monterey regarding traffic LOS and non-vehicular modes of transportation;

[2] In 2011, the Monterey Peninsula Airport District (MPAD) changed the name of the Airport from Monterey Peninsula Airport to Monterey Regional Airport.

- Policy inconsistencies with the *City of Monterey General Plan* and CONA Neighborhood Plan regarding restricting future aircraft growth;

- Exterior noise levels that would be above the acceptable noise standards for four residences by 2035 based on anticipated increases in aircraft operations; and

- The level of potential short-term and long-term cumulative development that could occur by 2025 and by 2035, respectively, would require major improvements to the local and regional road network.

Alternative 1

Alternative 1 includes changes in the proposed project design and/or timing of proposed project components to avoid or reduce some, but not all, of the Significant Unavoidable impacts of the Proposed Project listed above. Alternative 1 would result in the following Significant and Unavoidable impacts with respect to:

- Potentially significant impacts to the scenic resources of Highway 68 due to grading and tree removal during construction of the proposed Highway 68 frontage road, south side drainage improvements, and long-term non-aeronautical development (Impact AES-1);

- Potentially unmitigable impacts to Monterey pine trees/Monterey pine forest, a CNPS Rank 1B.1 plant and Sensitive Natural Community (Impacts BIO-12, BIO-20, BIO-31, and BIO-34) (305 trees and 4.54 acres in the short term; unknown in the long term);

- Potentially unmitigable impacts to Yadon's piperia, a federal endangered plant (Impacts BIO-17 and BIO-25) (156 individuals in the short term; unknown in the long term);

- Future GHG emissions above 2015 levels (a projected long-term increase of 15,080.2 metric tons/year (CO_2e) (Impact GHG-1);

- Inconsistencies with *General Plan Update for the City of Del Rey Oaks,* Policies C-3 and 13 related to anticipated traffic impacts if proposed mitigation proves infeasible (Impact LU-1);

- Inconsistency with *General Plan Update for the City of Del Rey Oaks,* Policy C-17 related to the proposed "north side" road (Impact LU-2);

- Inconsistency with *City of Monterey General Plan*, Policy b.4 of its Noise Element, which states, "Support limiting the number of fixed-base general aviation aircraft at the airport to the existing number." (Impact LU-3);

- Inconsistency with *City of Monterey General Plan*, Goal j, Policy j.2, and Programs j.1.1 and j.2.3 of its Circulation Element, which establish LOS D as an acceptable automobile LOS standard for roadway

segments that are not within a multi-modal corridor and require a traffic analysis to determine appropriate mitigation and the funding of a pro-rata share toward improvements if proposed mitigation proves infeasible (Impact LU-4);

- Inconsistency with CONA Neighborhood Plan, Airport Noise Policy 34, which states that the neighborhood is opposed to the use of neighborhood residential streets by automobile and truck traffic going to and from the Airport and businesses on the Airport property as Airport Road would remain in use for existing or replacement airport land uses located west of Gate V22 (Impact LU-6);

- Inconsistencies with CONA Neighborhood Plan, Noise Goals 2, 3, and 4 (Impact LU-7) (see Impact NOI-1 and NOI-2 below);

- Inconsistency with the 1987 CLUP until the ALUC updates the CLUP consistent with Alternative 1 (Impact LU-8);

- One additional residence within the Airport's 65-70 CNEL 2025 noise contour based on the FAA-approved operational forecasts (although this residence has been sound-attenuated for interior noise impacts) (Impact NOI-1);

- Four additional residences within the Airport's 65-70 CNEL 2035 noise contour based on the FAA-approved operational forecasts (although these residences have been sound-attenuated for interior noise impacts) (Impact NOI-2);

- Contributing project-related peak hour trips to two intersections located along Highway 68 or Highway 218 that are currently operating at unacceptable levels of service (Impact TR-4);

- Contributing project-related peak hour trips in the long term to intersections and highway segments that are projected to operate deficiently under future conditions (Impact TR-5);

- Future impacts related to increases in VMT, which are unknown and speculative at this time (Impact TR-7); and

- The following cumulative impacts as discussed in Chapter Five (see Section 5.6):

  - Impacts to the scenic viewshed and resources of Highway 68;

  - Additional criteria pollutants;

  - Yadon's piperia, sandmat manzanita, Monterey spineflower, coast live oak, and Monterey pine experience loss and ongoing pressure from cumulative development, including loss of habitat and habitat fragmentation, erosion/sedimentation, manmade intrusions, such as light, noise, and overall activity, and the introduction of non-native invasive species;

  - Additional GHG emissions;

- Policy inconsistencies with the cities of Del Rey Oaks and Monterey regarding traffic LOS and non-vehicular modes of transportation;

- Policy inconsistencies with the *City of Monterey General Plan* and CONA Neighborhood Plan regarding restricting future aircraft growth;

- Exterior noise levels that would be above the acceptable noise standards for four residences by 2035 based on anticipated increases in aircraft operations; and

- The level of potential short-term and long-term cumulative development that could occur by 2025 and by 2035, respectively, would require major improvements to the local and regional road network.

6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126(c) of the CEQA Guidelines requires that an EIR describe any significant irreversible environmental changes, which would occur as a result of the proposed action should it be implemented. The environmental effects related to implementation of the Proposed Project and Alternative 1 are analyzed in Chapter Four of this EIR. Implementation of the Proposed Project or Alternative 1 would redevelop land with uses comparable to the uses currently existing on the site. When combined with the large capital investment required for implementation of the improvements, it is improbable that the site would revert to any other use. Therefore, the Proposed Project or Alternative 1 represents a long-term commitment to aviation support uses on the property.

Implementation of the Proposed Project or Alternative 1 would result in a permanent change from pervious surface to impervious surface at the Airport. In the short term, the Proposed Project would result in an additional 700,850 square feet (sf) of impervious surfaces due to the expansion and relocation of the proposed north side general aviation (GA) apron and hangars, the proposed relocation of the commercial terminal complex and apron, and the proposed "north side" and Highway 68 frontage roads. Alternative 1 would result in an additional 721,921 sf of impervious surface from the same projects. The increase in impervious surface when compared to the Proposed Project is primarily due to the construction of a surface parking lot in front of the relocated commercial terminal rather than a parking garage. In the long term, changes from pervious surface to impervious surface would also occur due to the proposed aeronautical and non-aeronautical development under either the Proposed Project or Alternative 1 but cannot be quantified at this time. The Proposed Project or Alternative 1 would also result in an accompanying loss of the existing vegetation as discussed in detail in Section 4.4.

Both the Proposed Project and Alternative 1 would also require the commitment and reduction of non-renewable and/or slowly renewable resources, including petroleum fuels (operation and construction), and natural gas (for construction, lighting, heating, and cooling of structures); and lumber, sand/gravel, steel, copper, lead, and other metals (for use in the building construction, piping, and roadway infrastructure). This commitment would represent the loss of renewable and non-renewable resources that

are generally not retrievable. (Although wood products can be replaced, the Proposed Project or Alternative 1 does not include a program to do so other than in the context of the biological resources mitigation program.)

Other resources that are slow to renew and/or recover from environmental stresses would also be impacted by the Proposed Project or Alternative 1, such as air quality through the combustion of fossil fuels and production of greenhouse gases and water, natural gas, and electricity usage associated with construction activities and operation. However, by complying with current design standards, the new facilities would be more energy efficient than the existing buildings, which were constructed when less stringent energy efficient requirements were in place. The generation of air emissions and GHGs from all stages of the projects (i.e., construction, operation, and vehicular traffic) could also cause irreversible environmental changes related to the degradation of the air basin and a potential change in climate.

As discussed in Section 2.6.3, as well as throughout the analysis in Chapters Four and Five, the Proposed Project and Alternative 1 include a commitment to conservation measures, mitigation measures, and regulatory requirements designed to minimize the use and loss of both renewable and non-renewable resources and to avoid significant environmental changes to the extent feasible.

6.3 GROWTH-INDUCING IMPACTS

Under CEQA Guidelines, Sections 15126(d) and 15126.2(d), a discussion of growth inducement should include "the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment," "projects which would remove obstacles to population growth," or "the characteristic[s] of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively." CEQA Guidelines, Section 15126.2(d) also cautions against assuming that "growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

The Proposed Project and Alternative 1 are both primarily a capital improvement plan designed to accommodate the projected forecasts for the Airport through the year 2033 based on an examination of national and regional aviation and economic factors. The operational forecasts prepared for use in the Proposed Airport Master Plan (Proposed AMP) have been approved by FAA, assume a moderate pace of growth that is less than previous growth projections, such as the 2006 *Regional Airport System Plan*, which have been incorporated into the Transportation Agency for Monterey County's (TAMC) *2018 Monterey County Regional Transportation Plan* (TAMC 2018), and are independent of whether the proposed short- and long-term projects are implemented. As previously stated in Section 2.4, the purpose of the Proposed AMP is to address FAA airport design 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.

That being said, however, there are certain proposed project components that would allow the development of areas of the Airport that are currently not readily accessible for development. These aspects of the Proposed Project (or Alternative 1) would essentially remove obstacles to growth (e.g., through the construction or extension of infrastructure facilities that do not presently exist in the project area)

and allow for additional economic growth within the airport property as discussed below (Sections 6.3.1 and 6.3.3). As a result of these project components, both the Proposed Project and Alternative 1 are considered growth-inducing under CEQA.

6.3.1 Would the Proposed Project or Alternative 1 foster economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment?

Proposed Alternative and Alternative 1

Neither the Proposed Project nor Alternative 1 would construct additional housing units. Since direct population growth related to a project is determined by whether the project would construct or displace housing units, the Proposed Project and Alternative 1 would not directly foster population growth in the region.

As discussed in Section 4.13.5, the proposed short- and long-term projects could create as many as 2,500 new jobs, including approximately 1,575 office jobs, 100 restaurant jobs, 760 light industrial jobs, 14 additional jobs related to passenger amenities in the relocated commercial terminal, and other miscellaneous job opportunities. According to the Association of Monterey Bay Area Governments (AMBAG) regional growth forecasts (AMBAG 2018), employment in Monterey County from 2015 to 2035 is expected to grow by 26,662 jobs (Table 4.13A). Thus, the employment opportunities at the Airport due to proposed short- and long-term projects could represent approximately 9.4 percent of the projected future countywide jobs.

In general, the types of jobs that could be created by the Proposed Project and Alternative 1 are anticipated in the most current county and regional growth forecasts. Since the Airport is centrally located within the Seaside-Monterey Census County Division (CCD), the new employment opportunities would be considered "infill," rather than the creation of a new employment center located away from available housing or other public services. The jobs created are not expected to require a specialized set of skills that is not available within the county employment pool. Since the jobs that could be created by the Proposed Project or Alternative 1 are anticipated in the most current countywide and regional growth forecasts and would not require special skills that are not available within the county employment pool overall, the employment opportunities associated with the Proposed Project or Alternative 1 would not indirectly foster population growth or the construction of additional housing.

The proposed long-term opportunities for non-aeronautical development at the Airport under the Proposed Project or Alternative 1 could foster economic growth in the area. These future economic investments would be driven by market factors and cannot be determined at the programmatic level of analysis included in this EIR. Detailed project proposals are not available at this time.

6.3.2 Would the Proposed Project or Alternative 1 remove obstacles to population growth?

Proposed Alternative and Alternative 1

As discussed above in Section 6.3.1, the Proposed Project and Alternative 1 would not remove obstacles to population growth. Implementation of the Proposed Project or Alternative 1 would redevelop land with uses comparable to the uses currently existing on the site. When combined with the large capital investment required for implementation of the improvements, it is improbable that the site would revert to any other use. Therefore, the Proposed Project or Alternative 1 represents a long-term commitment to aviation support uses on the property.

6.3.3 Would the Proposed Project or Alternative 1 encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively?

Proposed Alternative and Alternative 1

Proposed "North Side" Road

The proposed "north side" road would remove an impediment to the development of the Airport's north side, which is currently constrained due to only one access through a residential neighborhood. The amount of traffic that can be accommodated, not only physically by the existing surface streets, but by the policies and goals of the City of Monterey for the CONA neighborhood, requires that an additional access be provided before future development of the Airport's north side can occur. Thus, the proposed "north side" road would contribute directly to the amount of future landside development potentially located at the Airport. For purposes of analysis, the EIR assumed the following additional development once the proposed "north side" road is constructed as a worst case: 400,000 sf of light industrial development (for example, warehousing); 325,000 sf of office development; 106 additional aircraft storage hangars; and ancillary aeronautical uses, such as a wash rack and a maintenance yard. These assumptions were based on the amount of future hangar and other aeronautical needs described for the Airport in the Proposed AMP (Coffman Associates 2015), as well as a market/land use analysis prepared for the north side of the Airport to determine future north side non-aeronautical land uses at a conceptual level (**Appendix O**).

Chapters Four and Five of this EIR contain detailed analysis of the potential impacts that could occur from this future "north side" growth. These include: impacts to sensitive biological resources; additional vehicular traffic and associated vehicular noise, emissions, and GHGs; demand for utilities (electricity, water); and additional demand for wastewater and solid waste disposal.

Proposed Highway 68 Frontage Road

The proposed Highway 68 frontage road would remove an impediment to the development of an approximate 3.6-acre parcel on the Airport's south side. This parcel, although owned by the Airport, has no access and is, thus, undevelopable at this time. With the construction of the proposed Highway 68 frontage road, the parcel could be opened up for landside development. For purposes of analysis, the

EIR assumed the following as a worst case: 94,000 sf of general office development, based on the development criteria contained in the City of Monterey Zoning Code for the subject parcel (City of Monterey 2017). Based on the analysis contained in Chapters Four and Five, potential impacts that could occur from this future "south side" growth include: impacts to sensitive biological resources; additional vehicular traffic and associated vehicular noise, emissions, and GHGs; demand for utilities (electricity, water); and additional demand for wastewater and solid waste disposal.

6.4 ENERGY ANALYSIS

Section 21100(b)(3) of the California Public Resources Code and Appendix F to the CEQA Guidelines require a discussion of potential energy impacts of proposed projects. Appendix F states:

> The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:
>
> (1) Decreasing overall per capita energy consumption,
> (2) Decreasing reliance of fossil fuels, such as coal, natural gas and oil, and
> (3) Increasing reliance on renewable energy sources.

Appendix F of the CEQA Guidelines also identifies that "EIRs include a discussion of the potential energy impacts of proposed project, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy."

This discussion has been provided previously in Chapters Four and Five under Energy (see Section 4.6 and 5.5.6).