



Appendix A

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**TAXIWAY "A" RELOCATION RISK ASSESSMENT**

November 4, 2015

Mr. Mark Bautista, AAE  
Deputy General Manager  
**MONTEREY PENINSULA AIRPORT DISTRICT**  
**Planning and Development**  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940

**RE: Monterey Regional Airport – Taxiway “A” Relocation Risk Assessment**

Dear Mark,

The purpose of this letter is to present the results of a risk assessment for the relocation of a portion of parallel Taxiway “A” which is located south of Runway 10R-28L at the Monterey Regional Airport (MRV). This risk assessment was requested during a June 16, 2015 MRV Airport Master Plan briefing meeting with the Airports Division Manager of the Federal Aviation Administration’s (FAA’s) Western-Pacific Region and his staff. As outlined below, increasing the runway centerline to taxiway centerline distance from 275 feet to 327.5 feet reduces the risk to less than 1.E-07 (1 accident per 10,000,000 landings) and would be considered acceptable to the FAA for purposes of issuing a Modification of Airfield Separation Standards.

**Background**

As part of the ongoing Airport Master Plan for the Monterey Regional Airport, one of the major issues that needed to be addressed is the 275 foot centerline-to-centerline separation distance between Runway 10R-28L and a ±2,800 foot portion of Taxiway “A” between exit Taxiways “E” and “K”. Because this portion of Taxiway “A” is only 275 feet from the runway centerline, the wingtips of aircraft with wingspans greater than 50 feet operating on Taxiway “A” penetrate the Runway Safety Area (RSA) of Runway 10R-28L. In addition, the Hold Line locations for Taxiways “F”, “G”, “J”, and “K” are located at 200 feet from the centerline of Runway 10R-28L, and are inside the RSA.

According to FAA Advisory Circular (AC) 150/5300-13A (Change 1), the runway centerline to parallel taxiway centerline separation should be 400 feet. However, during the evaluation of alternatives for the Airport Master Plan, it was determined that it was not practicable, or feasible, to relocate Taxiway “A” to the 400 foot separation distance due to various engineering and environmental issues. As a result, the recommendation was to relocate the ±2,800 foot section of

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**Mr. Mark Bautista**

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Taxiway "A" to 327.5 feet which would then be consistent with the separation distance of the balance of Taxiway "A". Moving the  $\pm 2,800$  foot section of Taxiway "A" to 327.5 feet would ensure that Airplane Design Group (ADG) III aircraft (wingspans less than 118 feet) could taxi the full length of Taxiway "A" and their wingtips would not penetrate the RSA. In addition, the Hold Line locations for Taxiways "F", "G", "J", and "K" could be moved to 250 feet and remain outside of the RSA. Correcting the RSA issue by relocating a portion of Taxiway "A", however, would limit the apron space available for parking and maneuvering of commercial passenger aircraft directly in front of the existing Passenger Terminal Building. The limited apron space as well as the age (60 plus years) and condition of the Terminal Building resulted in the additional master plan recommendation to construct a new Terminal Building in a new and better location.

### **Methodology**

Because the 327.5 foot runway centerline-taxiway centerline distance does not meet the 400 foot separation distance recommended by FAA's AC, a Modification of Standards (MOS) will need to be approved by the FAA. During a recent meeting between the FAA and the Monterey Peninsula Airport District staff to discuss this issue, FAA requested that the Airport District analyze the reduction of risk associated with moving the  $\pm 2,800$  portion Taxiway "A" to the 327.5 distance. Because FAA does not provide any specific guidance on how to quantify the risk associated with the separation between a runway centerline and a parallel taxiway centerline, it was decided that the use of Airport Cooperative Research Program (ACRP) Report 51 (*Risk Assessment Method to Support Modification of Airfield Separation Standards*) would provide the appropriate guidance. According to ACRP Report 51:

*"The Risk Assessment Method to Support Modification of Airfield Separation Standards provides a methodology that airports can use to support their request for modification of standards. It is intended to be used in those circumstances where the design criteria for separations between taxiways/taxilanes and (1) other taxiways/taxilanes and (2) fixed or movable objects as well as separations between taxiways and runways cannot be met. This risk-based methodology will be useful to airport staff and their consultants as they assess the risks associated with non-standard separations at existing constrained airports where the standards can't be practicably met."*

ACRP Report 51 further states:

*"What is the risk if larger aircraft are allowed to operate at these airports with non-standard separations? Currently, there are no risk-based methodologies for assessing such risks, and each situation is treated as a unique case. The FAA may allow operations at airports that do not comply with minimum separation distances by evaluating an MOS submitted by the airport operator. The objective is to keep the airport/aircraft operations at a level of safety equivalent to that achieved by standard separations."*

The objective of ACRP Report 51 research effort was to develop a simple and practical methodology for assessing the risk of aircraft collisions associated with non-standard airfield separations. The tool which was developed for analysis is intended to support MOS requests for non-standard separations. The methodology is based on the probability of lateral and vertical deviations from the intended path during landing, takeoff, and taxiing operations. A series of risk

plots based on centerline or wingtip separations is provided for each Aircraft Design Group (ADG), and step-by-step procedures are described for each type of separation involved in the analysis, such as runway and taxiway, and taxiway and taxiway. The methodology was validated using actual MOS cases approved by the FAA that covered a spectrum of scenarios, airports, and FAA regions. Relevant information was gathered by the ACRP consultant for each case to characterize the non-standard situation and was analyzed using the methodology developed in this study. Risk criteria were suggested based on the risk matrix used by the FAA in safety management systems, on the evidence of accident and incident rates, and the consequences gathered in this research effort.

### **Risk Assessment Results**

Based on the guidance provided in ACRP Report 51, two (2) risk assessment scenarios for Monterey Regional Airport were evaluated. The first scenario (Scenario #1) provided an assessment of the risk associated with keeping the centerline of the  $\pm 2,800$  foot segment of parallel Taxiway "A" in its present location which is 275 feet from the centerline of Runway 10R-28L. The second scenario (Scenario #2) provides an assessment of the risk associated with relocating the same segment of parallel Taxiway "A" to 327.5 feet. According to the ACRP Report 51, two segments of the aircraft's flight should be evaluated: the segment associated with the airborne (approach) phase, and the ground phase associated with the landing rollout of the aircraft. The takeoff phase is not evaluated because the highest risk condition is for landing. Figure AA-33 of the ACRP Report was used to estimate the risk of collision for the approach phase for Aircraft Design Group III aircraft utilizing a Category I Instrument Landing System (ILS). Figure AA-43 of the ACRP Report was used to estimate the risk of collision for the landing roll-out phase for Aircraft Design Group III aircraft.

#### **Scenario #1 (275 foot separation)**

- Probability of an accident during the airborne (approach) phase: 1 accident per 588,235,294 landings (1.7E-9)
- Probability of an accident during the ground (landing rollout) phase: 1 accident per 7,692,307 landings (1.3E-7).

#### **Scenario #2 (327.5 foot separation)**

- Probability of an accident during the airborne (approach) phase: 1 accident per 1,333,333,333 landings (7.5E-10).
- Probability of an accident during the ground (landing rollout) phase: 1 accident per 12,048,192 landings (8.3E-8).

According to the ACRP Report, FAA's acceptable level of risk is considered to be less than 1 accident per 10,000,000 landings (1.E-07). As outlined above, the risk associated with the approach phase for both Scenarios is less than 1.E-07. The existing risk for the landing rollout phase is greater than 1.E-07 for Scenario #1 (275 foot separation) and is considered by FAA to be unacceptable. However, increasing the separation to 327.5 feet reduces the risk to less than

**Mr. Mark Bautista**

**November 4, 2015**

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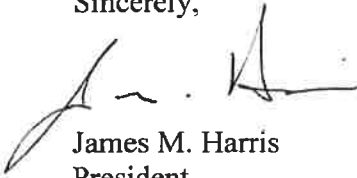
1.E-07 and would be considered acceptable to the FAA for purposes of issuing a Modification of Standards.

**Conclusions**

Increasing the separation distance from the centerline Runway 10R-28L to the centerline of Taxiway "A" from 275 feet to 327.5 feet reduces the probability of an accident during the airborne (approach) phase by approximately 127 percent. In both cases, the level of risk is less than 1 accident per 10,000,000 landings. However, for the landing rollout phase, the increase in separation distance reduces the probability of an accident by approximately 57 percent and the level of risk is reduced from greater than 1 accident per 10,000,000 landings (**unacceptable**) to less than 1 accident per 10,000,000 landings (**acceptable**). As a result, based on the significant increase in safety resulting from the change in separation distances, the FAA should support a Modification of Airfield Separation Standards for the increase of runway to parallel taxiway centerline separation distance of 327.5 feet.

If you have any questions regarding this evaluation, or if you need additional information, please don't hesitate to give me a call.

Sincerely,



James M. Harris  
President

NOTE: A portion of the 2,800-lf taxiway shift discussed in the above Risk Assessment is being completed as part of another project, separate from the proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocation project. The Proposed Action in this EA is to shift an 1,850-lf portion of the taxiway.



Appendix B

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**AGENCY COORDINATION AND SCOPING PROCESS**

**ENVIRONMENTAL ASSESSMENT ON A  
PROPOSED AIRPORT SAFETY ENHANCEMENT PROJECT  
FOR TAXIWAY "A" RELOCATION & ASSOCIATED BUILDING RELOCATIONS  
AGENCY/STAKEHOLDER COORDINATION LIST**

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Ordered by:

## PROOF OF PUBLICATION

STATE OF CALIFORNIA  
County of Monterey

I am a citizen of the United States and a resident of the County aforesaid. I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of The Monterey Herald, a newspaper of general circulation, printed and published daily and Sunday in the City of Monterey, County of Monterey, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Monterey, State of California; that the notice, of which the annexed is a printed copy (set in type not smaller than 6 point), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

11/06/16

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Executed on 11/06/2016 at Monterey, California.

Signature

The Monterey Peninsula Airport District (District), as owner and operator of the Monterey Regional Airport (Airport), is proposing to undertake an Airport Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations (safety enhancement project). Because the proposed project has the potential to affect the environment, the District is currently preparing an Environmental Assessment (EA) on the proposed safety enhancement project pursuant to the requirements of Section 102(2) of the National Environmental Policy Act (NEPA) of 1969. The EA will conform to the requirements and standards set forth by the Federal Aviation Administration (FAA) as contained in FAA Order 1050.1F: Policies and Procedures for Considering Environmental Impacts and FAA Order 5050.4B: National Environmental Policy Act Implementing Instructions for Airport Actions. The FAA is the Lead Agency for the project under NEPA.

The purpose of this project is to provide a consistent 327.5-foot, centerline to centerline, separation between the primary runway at the Airport (Runway 10R-28L) and the parallel taxiway on its south side (Taxiway A). Currently, there is an approximate 1,850-linear foot portion of Taxiway A that is only 275 feet from Runway 10R-28L, centerline to centerline. The recent Draft Airport Master Plan recommends relocating this portion of Taxiway A to provide a uniform runway-taxiway separation of 325.7 feet for the entire length of the taxiway. A risk assessment completed for FAA, during the Master Plan evaluation process, indicates that airport safety would be enhanced significantly by providing a uniform 327.5 feet separation along the entire length of Taxiway A.

Once this safety improvement is made, however, there will be insufficient separation between Taxiway A and the existing commercial terminal for aircraft parking and airport vehicle movement areas. Therefore, the proposed project includes the demolition of the existing commercial terminal, which is over 60 years old, and the relocation and construction of a new commercial terminal complex in a location that would enhance the safety of aircraft and vehicles as they move along Taxiway A. Various alternatives for the terminal relocation, which would include internal airport access and road improvements as well as relocated automobile parking, will be addressed to accommodate the change in runway/taxiway separation. The new relocated terminal complex proposes the construction of a Highway 68 frontage road which would require either potential property acquisition or easement.

To make room on the south side of the airfield for a new relocated commercial terminal complex, the existing General Aviation hangars located southeast of the existing aircraft rescue and firefighting (ARFF) building would be relocated to the north side of the airfield adjacent to Runway 10L-28R. The existing ARFF building would also need to be relocated to another area on the south ramp to make room for the commercial terminal apron. All of these project components would be phased over approximately ten years.

A project location/vicinity exhibit and other proposed action exhibits showing the various project components can be viewed in the Airport Planning and Development Office at 200 Fred Kane Drive, Suite 200, Monterey, CA, or on the project website. The project website can be accessed at [www.montereyairport.com](http://www.montereyairport.com) via the "Click Here for Airport Projects In-Progress" box and by choosing the "Environmental Assessment (EA) for the Proposed Airport Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations" link.

A Public Information Workshop will be held at the Airport's Board Room on the second floor of the Airport Passenger Terminal Building at 200 Fred Kane Drive, Monterey, CA 93940 on December 6, 2016, from 4 - 6 PM. Agencies and other interested parties are invited to attend and submit comments regarding the preparation of the EA at that time. The workshop will be held in an "open house" format; no formal presentation will be provided.

Comments regarding potential environmental impacts of the proposed project will be accepted by the Airport during a 45-day scoping period from November 6 - December 20, 2016. Please provide written comments to the physical/mailling address, email address, or website as follows: Monterey Peninsula Airport District, Planning & Development Department, 200 Fred Kane Drive Suite 200, Monterey, CA 93940; [planning@montereyairport.com](mailto:planning@montereyairport.com); or by using the Comments tab of the project website (see previously stated instructions above). If you have any questions or need additional information, please contact the Planning and Development Department at (831) 648-7000, Ext. 208.

November 3, 2016

Regulatory Division  
**U.S. Army Corps of Engineers**  
1455 Market Street, 16th Floor  
San Francisco, CA 94103-1398

***RE: Environmental Assessment for Proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation & Associated Building Relocations at Monterey Regional Airport, Monterey County, CA***

Dear Sir or Ma’am:

The Monterey Peninsula Airport District (District), as owner and operator of the Monterey Regional Airport (Airport) (Figure 1), is proposing to undertake an Airport Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations (safety enhancement project). The purpose of this project is to provide a consistent 327.5-foot, centerline to centerline, separation between the primary runway at the Airport (Runway 10R-28L) and the parallel taxiway on its south side (Taxiway A). Currently, there is an approximate 1,850-linear foot portion of Taxiway A that is only 275 feet from Runway 10R-28L, centerline to centerline (Figure 2). The recent Draft Airport Master Plan recommends relocating this portion of Taxiway A to provide a uniform runway-taxiway separation of 325.7 feet for the entire length of the taxiway (Figure 2). A risk assessment completed for FAA, during the Master Plan evaluation process, indicates that airport safety would be enhanced significantly by providing a uniform 327.5 feet separation along the entire length of Taxiway A.

Once this safety improvement is made, however, there will be insufficient separation between Taxiway A and the existing commercial terminal for aircraft parking and airport vehicle movement areas. Therefore, the proposed project includes the demolition of the existing commercial terminal, which is over 60 years old, and the relocation and construction of a new commercial terminal complex in a location that would enhance the safety of aircraft and vehicles as they move along Taxiway A. Various alternatives for the terminal relocation, which would include internal airport access and road improvements as well as relocated automobile parking, will be addressed to accommodate the change in runway/taxiway separation. The new relocated terminal complex proposes the construction of a Highway 68 frontage road which would require either potential property acquisition or easement.

To make room on the south side of the airfield for a new relocated commercial terminal complex, the existing General Aviation hangars located southeast of the existing aircraft rescue and firefighting (ARFF) building would be relocated to the north side of the airfield adjacent to Runway 10L-28R. The existing ARFF building would also need to be relocated to another area on the south ramp to make room for the commercial terminal apron. All of these project components would be phased over approximately ten years in the following order:

- Phase 1: General Aviation hangar relocation from the southeast part of the Airport to north of the airfield and potential property acquisition or easement to allow for a Highway 68 frontage road;
- Phase 2: Construction of the new Commercial passenger terminal complex (including apron, and taxilanes, terminal access road, and automobile parking) and south side frontage road; ARFF building demolition and construction of a temporary ARFF facility;
- Phase 3: Demolition of the existing terminal building and construction of a new relocated ARFF building;
- Phase 4: Shift Taxiway “A” to 327.5 feet from Runway 10R-28L (including connector taxiways “G” and “J”).

Figure 3 shows the buildings and pavement on the south side of the airport, existing and proposed; Figure 4 depicts the phasing of the entire safety enhancement project.

Because the proposed project has the potential to affect the environment, the District is currently preparing an Environmental Assessment (EA) on the proposed safety enhancement project pursuant to the requirements of Section 102(2) of the *National Environmental Policy Act (NEPA) of 1969*. The EA will conform to the requirements and standards set forth by the Federal Aviation Administration (FAA) as contained in FAA Order 1050.1F: *Policies and Procedures for Considering Environmental Impacts* and FAA Order 5050.4B: *National Environmental Policy Act Implementing Instructions for Airport Actions*. The FAA is the Lead Agency for the project under NEPA.

Therefore, the purpose of this letter is to solicit your comments or concerns regarding potential environmental impacts of the proposed project. **Please provide written comments regarding this project to the physical address, email address, or website\* listed below by 5:00 PM, December 20, 2016.**

**Mailing/Physical Address: Monterey Peninsula Airport District  
Planning & Development Department  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940  
Attn: Chris Morello**

**Email Address: [planning@montereyairport.com](mailto:planning@montereyairport.com)**

**\* Comments on the EA can be submitted by 5:00 PM, December 20, 2016, using the Comments tab of the project website, which can be accessed from the Airport website at: [www.montereyairport.com](http://www.montereyairport.com) using the “Click Here for Airport Projects In-Progress” box and then choose the “Environmental Assessment (EA) for the Proposed Airport Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations” link.**

A Public Information Workshop will be held at the Airport’s Board Room on the second floor of the Airport Passenger Terminal Building at 200 Fred Kane Drive, Monterey, CA 93940 on **December 6, 2016, from 4 - 6 PM**. Agencies and other interested parties are invited to attend and submit comments regarding the preparation of the EA at that time. The workshop will be held in an “open house” format; no formal presentation will be provided.

If you have any questions or need additional information, please contact the Planning and Development Department at (831) 648-7000, Ext. 208.

Sincerely,

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CC: Doug Pomeroy, Environmental Protection Specialist, FAA Western-Pacific Region, San Francisco Airports District Office  
Judi Krauss, Environmental Planner, Coffman Associates



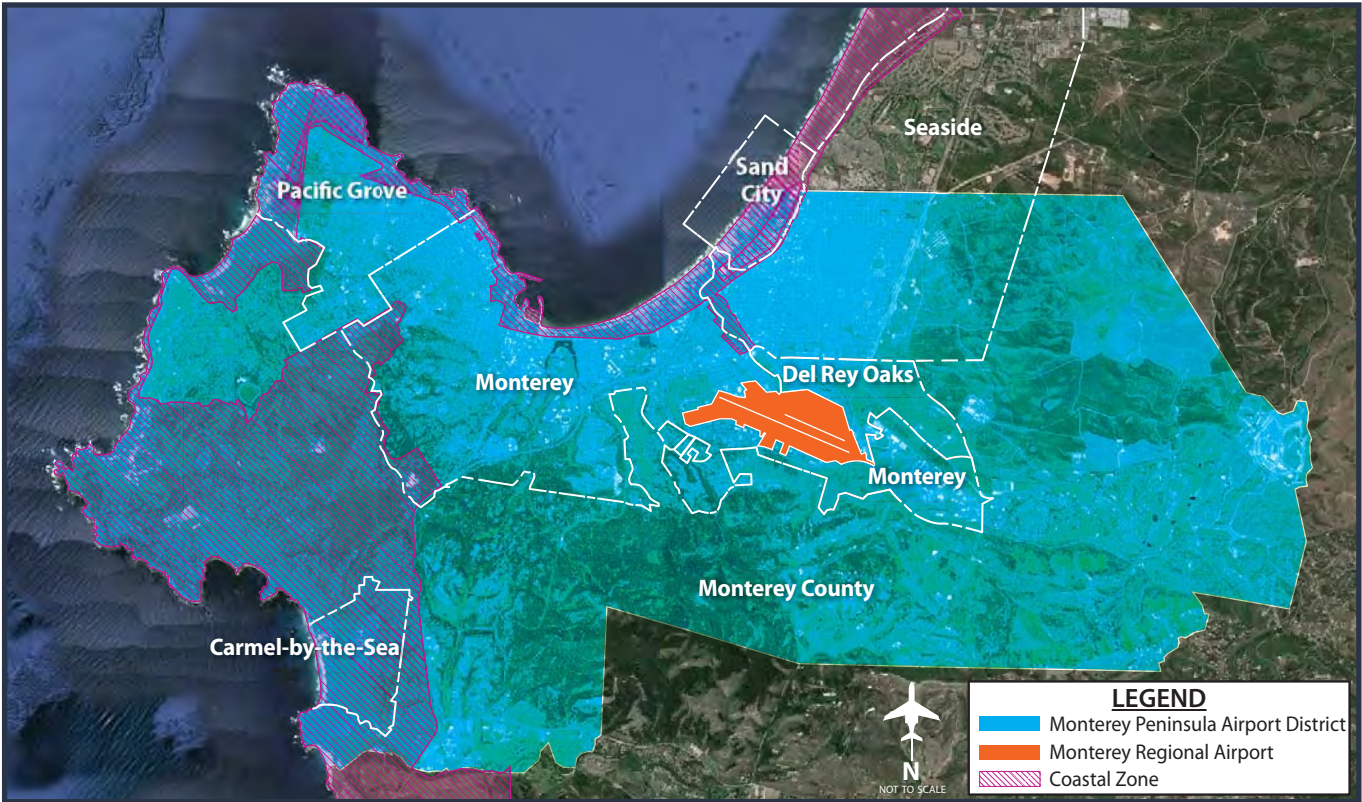


Figure 1  
VICINITY/LOCATION MAP



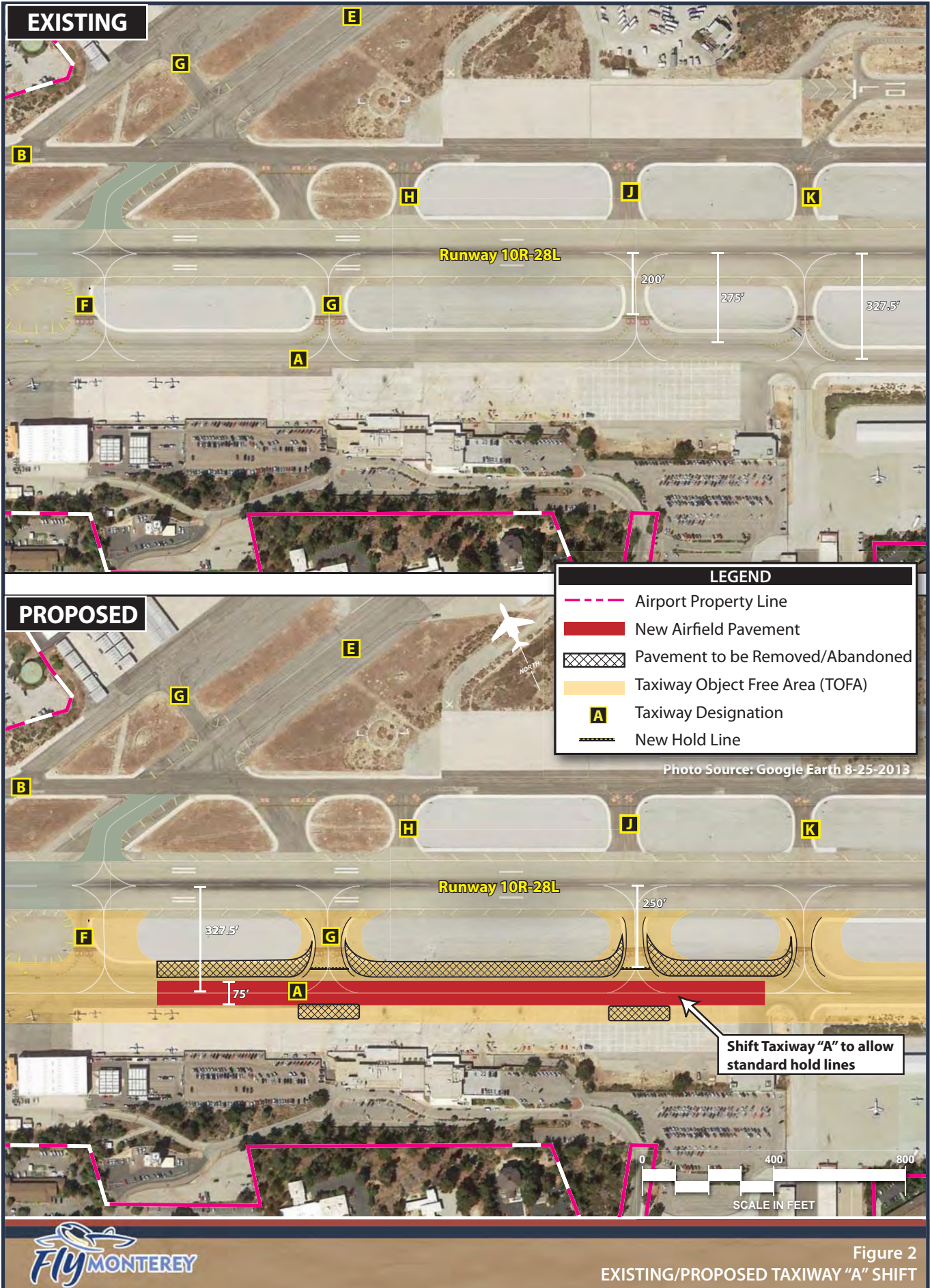


Figure 2  
EXISTING/PROPOSED TAXIWAY "A" SHIFT

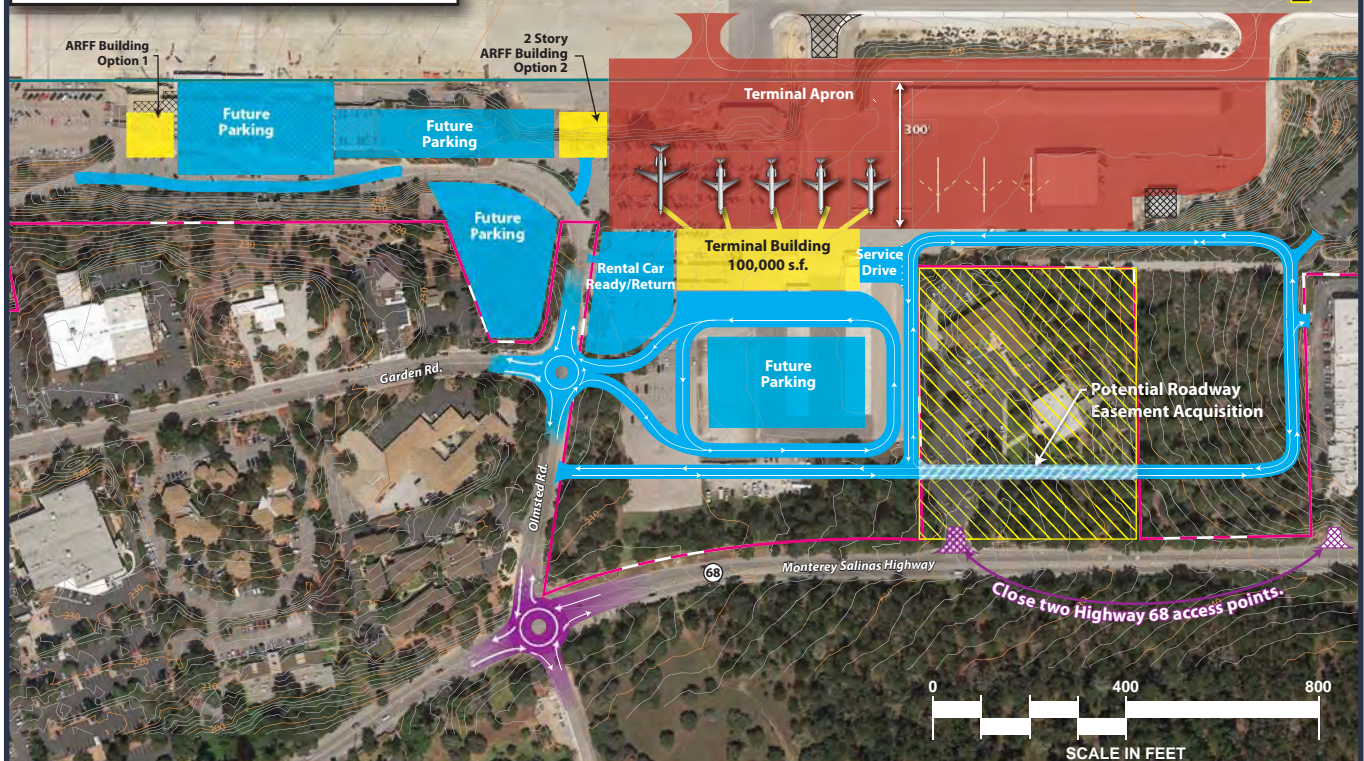




**LEGEND**

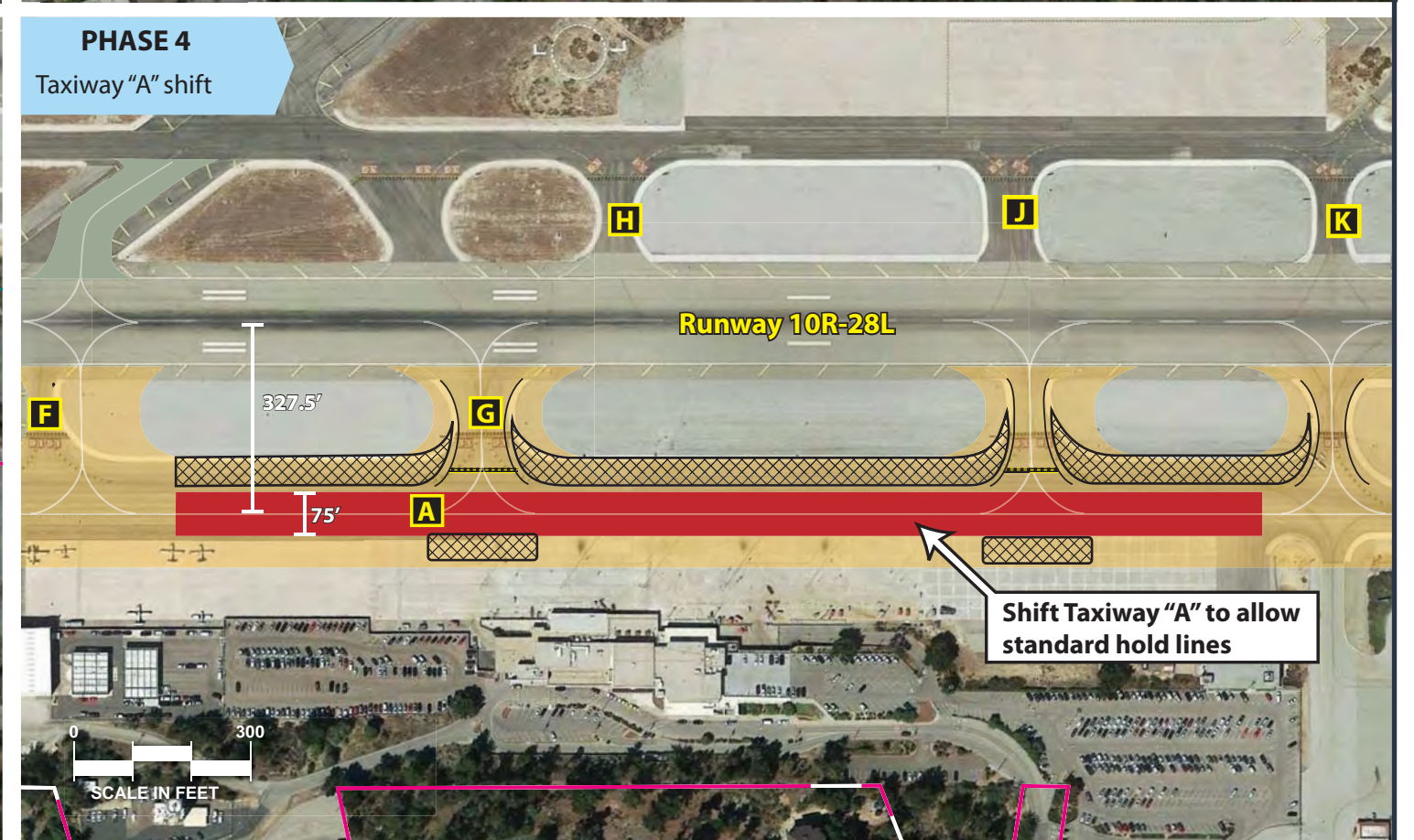
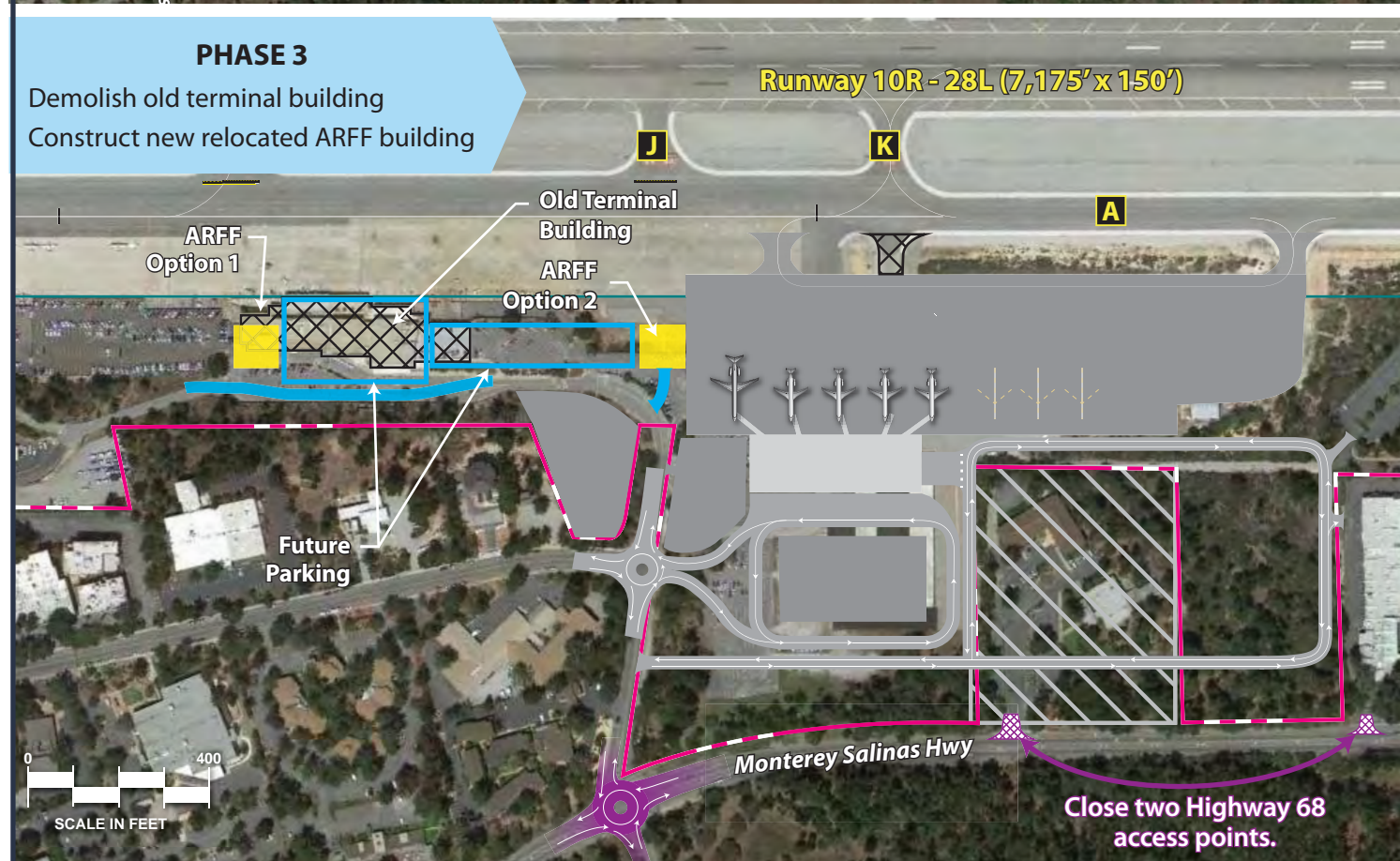
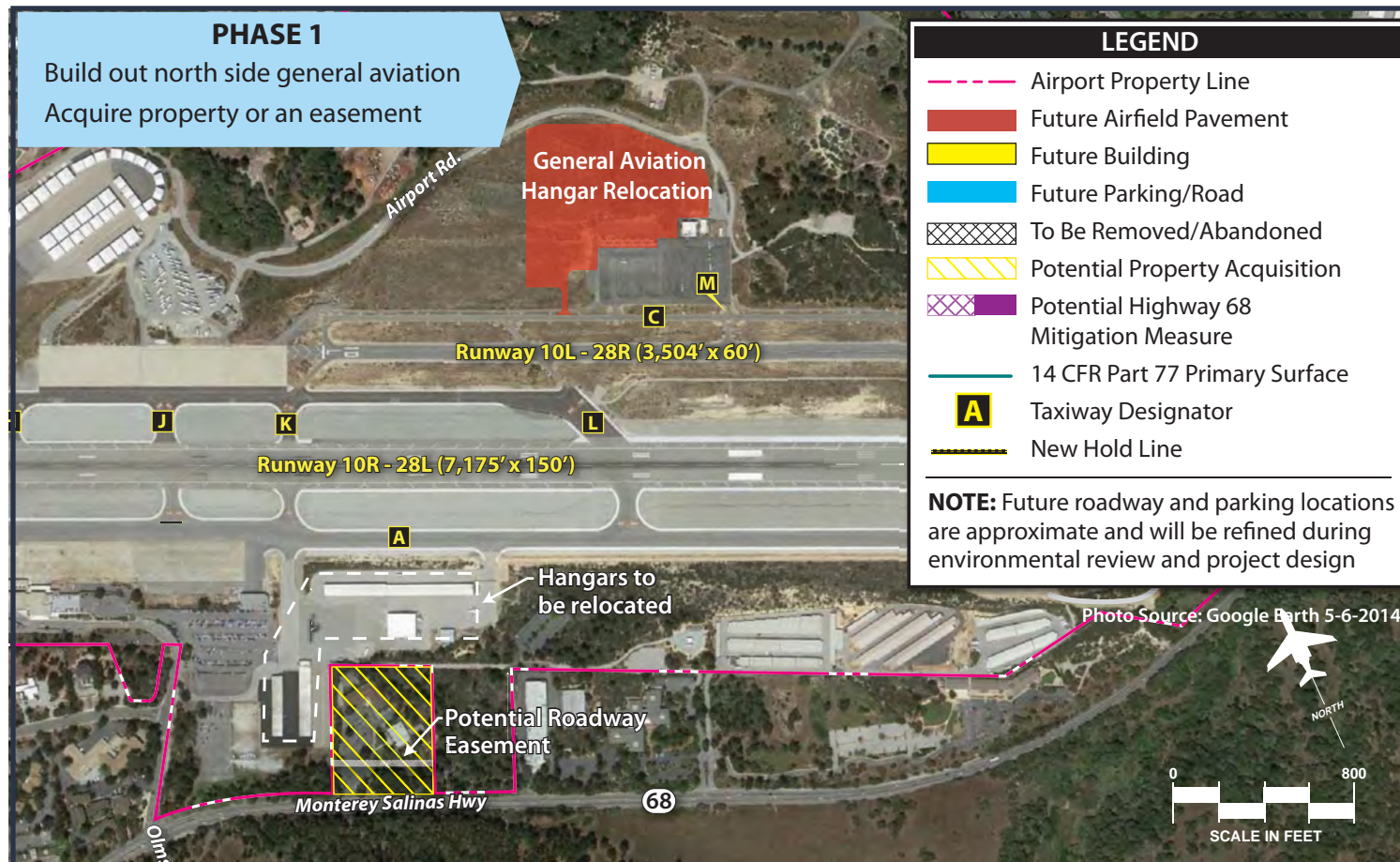
- Airport Property Line
- Future Airfield Pavement
- Future Building
- Future Parking/Road
- To Be Removed/Abandoned
- Potential Property Acquisition
- Potential Highway 68 Mitigation Measure
- 14 CFR Part 77 Primary Surface
- A Taxiway Designator

**NOTE:** Future roadway and parking locations are approximate and will be refined during environmental review and project design



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Below is a list of EA scoping responses for the Monterey Safety Enhancement EA:

- Crina Chan, California Dept. of Conservation, emailed 11/09/16
- David Duke, San Benancio neighborhood, emailed 11/09/16
- Louise Miranda Ramirez, OCEN, letter dated 11/09/16
- Daniel Meier, Allegiant, emailed 11/10/16
- Naomi Schowalter, US ACE, emailed 11/10/16 w/attached letter dated 1/26/16
- Barbara Lovero, 401 Estrello Doro, emailed 12/13/16
- Doug Flaherty, 210 Stuart Avenue, comment form dated 12/6/16
- Glen Knowles, USFWS, Ventura Fish and Wildlife Office, letter dated 12/16/16
- Norman Groot, Farm Bureau Monterey, letter dated 12/19/16
- Richard Ruccello, CONA, letter dated 12/19/16
- Robert Talbott, Robert Talbott, Inc., letter dated 12/19/16
- Clyde Roberson, City of Monterey, letter dated 12/20/16
- Robert Yoha, 234 Euclid Ave, comment form and letter dated 12/20/16

**From:** Chris Morello  
**To:** [Chan, Crina@DOC](mailto:Chan_Crina@DOC)  
**Cc:** [Judi Krauss](#); [Jim Harris](#)  
**Subject:** RE: General Plan Amendment # 16-0264  
**Date:** Wednesday, November 09, 2016 3:53:48 PM  
**Attachments:** [image004.png](#)  
[image001.png](#)

---

Crina

This is an Environmental Assessment and using the State Clearing House is optional for NEPA projects. The Airport chose to send the Notice of Preparation via certified mail on our own so there will not be a SCH#.

**Chris Morello**

**Senior Manager**

**Monterey Regional Airport**

831-333-2312

831-402-9444 mobile

<http://www.montereyairport.com>



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---

**From:** Chan, Crina@DOC [mailto:Crina.Chan@conservation.ca.gov]  
**Sent:** Wednesday, November 09, 2016 2:29 PM  
**To:** Planning <Planning@montereyairport.com>  
**Cc:** State.Clearinghouse@opr.ca.gov  
**Subject:** General Plan Amendment # 16-0264

Good Afternoon,

We have received the attached project for review. I am looking to find a SCH#. I called State Clearing House and they do not have the project. Would you happen to know when you send it over?

Thank you,

Crina

*Crina Chan*

Department of Conservation  
Office of Governmental and Environmental Relations  
801 K Street, MS 24-02 Sacramento, CA 95814  
(916) 445-8733  
[Crina.Chan@conservation.ca.gov](mailto:Crina.Chan@conservation.ca.gov)



**From:** Shelley Glennon  
**To:** [Planning](#)  
**Subject:** Fw: San Benancio Neighborhood Point of Contact  
**Date:** Wednesday, November 09, 2016 3:15:20 PM  
**Attachments:** [image001.png](#)  
[image005.png](#)

---

FYI for the record.

---

**From:** David Duke <[REDACTED]>  
**Sent:** Monday, November 7, 2016 11:16 AM  
**To:** Shelley Glennon  
**Subject:** RE: San Benancio Neighborhood Point of Contact

Hi Shelley,

I received a certified letter from Chris Morello last week regarding proposed construction at the airport.

After a brief review, this does not seem to deal with the noise issues our neighbors have complained about.

Nevertheless, I will send it to interested parties.

As I mentioned to you, I am trying to find someone on Facebook that will be the main contact for the San Benancio group.

When I find a will person, should I have them contact you?

Thanks,  
David

---

**From:** Shelley Glennon [mailto:[sglennon@montereyairport.com](mailto:sglennon@montereyairport.com)]  
**Sent:** Friday, October 14, 2016 4:10 PM  
**To:** [REDACTED]  
**Subject:** San Benancio Neighborhood Point of Contact

Hello David,

I received your email contact from Ken Griggs. He informed me that you are the main point of contact for the San Benancio Neighborhood, is that correct? If so, can you provide me your mailing address to receive notifications from the Airport?

Thank you,  
Shelley Glennon | Planning Manager



Planning & Development Department  
Monterey Peninsula Airport District  
Phone: (831) 648-7000 Ext. 209  
Mobile: (831) 402-0731



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*Ohlone/Costanoan-Esselen Nation*



*Previously acknowledged as  
The San Carlos Band of  
Mission Indians  
The Monterey Band  
And also known as  
O.C.E.N. or Esselen Nation  
P.O. Box 1301  
Monterey, CA 93942*

[www.ohlonecostanoanesselenation.org](http://www.ohlonecostanoanesselenation.org)

November 9, 2016

Monterey Peninsula Airport District  
Planning & Development Department  
Attn: Chris Morello  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940

Re: Environmental Assessment for Proposed Airfield Safety Enhancement Project for Taxiway "A"  
Relocation & Associated Building Relocations at Monterey Regional Airport, Monterey County, CA  
CA-MNT-728

Saleki Atsa,

Ohlone/Costanoan-Esselen Nation is an historically documented previously recognized tribe. OCEN is the legal tribal government representative for over 600 enrolled members of Esselen, Carmeleno, Monterey Band, Rumsen, Chalon, Soledad Mission, San Carlos Mission and/or Costanoan Mission Indian descent of Monterey County. Though other indigenous people may have lived in the area, the area is the indigenous homeland of our people. Included with this letter please find a territorial map by Taylor 1856; Levy 1973; and Milliken 1990, indentifying Tribal areas.

**Ohlone/Costanoan-Esselen Nation objects to all excavation in known cultural lands, continued distruction of our sacred burial grounds and villages, even when they are described as previously disturbed, and of no significant archaeological value. We ask that destruction within the area of CA-MNT-728 end.** Please be advised that it is our first priority that our ancestor's remains be protected and undisturbed. We desire that all sacred burial items be left with our ancestors on site or as culturally determined by OCEN. All cultural items returned to Ohlone/Costanoan-Esselen Nation. We ask for the respect that is afforded all of our current day deceased, by no other word these burial sites are cemeteries, respect for our ancestors as you would expect respect for your deceased family members in today's cemeteries. **Our definition of respect is no disturbance.**

OCEN's Tribal leadership desires to be provided with archaeological reports/surveys, including subsurface testing, and presence/absence testing. OCEN request to be included in mitigation and recovery programs, reburial of any of our ancestral remains, placement of all cultural items, and that a Native American Monitor of Ohlone/Costanoan-Esselen Nation, approved by the OCEN Tribal Council be used within our aboriginal territory.

We request consultation on projects affecting our aboriginal homelands, which include all ground disturbance. We look forward to hearing more information about this project; please feel free to contact me at (408) 629-5189. Nimasianexelpasaleki. Thank you for your attention to this matter.

Sincerely and Respectfully Yours,

Louise J. Miranda Ramirez, Chairperson  
Ohlone/Costanoan-Esselen Nation  
(408) 629-5189

Cc: OCEN Tribal Council



BOARD OF DIRECTORS

Mary Ann Leffel | Chairman  
Carl Miller  
Matthew Nelson  
William Sabo  
Richard Searle

November 3, 2016

Louise Miranda-Ramirez  
Chairperson  
**Ohlone/Coastanoan-Esselen Nation**  
2653 McLaughlin Avenue  
San Jose, CA 95121

**RE: *Environmental Assessment for Proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation & Associated Building Relocations at Monterey Regional Airport, Monterey County, CA***

Dear Ms. Miranda-Ramirez:

The Monterey Peninsula Airport District (District), as owner and operator of the Monterey Regional Airport (Airport) (Figure 1), is proposing to undertake an Airport Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations (safety enhancement project). The purpose of this project is to provide a consistent 327.5-foot, centerline to centerline, separation between the primary runway at the Airport (Runway 10R-28L) and the parallel taxiway on its south side (Taxiway A). Currently, there is an approximate 1,850-linear foot portion of Taxiway A that is only 275 feet from Runway 10R-28L, centerline to centerline (Figure 2). The recent Draft Airport Master Plan recommends relocating this portion of Taxiway A to provide a uniform runway-taxiway separation of 325.7 feet for the entire length of the taxiway (Figure 2). A risk assessment completed for FAA, during the Master Plan evaluation process, indicates that airport safety would be enhanced significantly by providing a uniform 327.5 feet separation along the entire length of Taxiway A.

Once this safety improvement is made, however, there will be insufficient separation between Taxiway A and the existing commercial terminal for aircraft parking and airport vehicle movement areas. Therefore, the proposed project includes the demolition of the existing commercial terminal, which is over 60 years old, and the relocation and construction of a new commercial terminal complex in a location that would enhance the safety of aircraft and vehicles as they move along Taxiway A. Various alternatives for the terminal relocation, which would include internal airport access and road improvements as well as relocated automobile parking, will be addressed to accommodate the change in runway/taxiway separation. The new relocated terminal complex proposes the construction of a Highway 68 frontage road which would require either potential property acquisition or easement.

EXECUTIVE STAFF Michael La Pier, AAE | Executive Director Scott Huber | District Counsel  
200 Fred Kane Drive, Suite 200 | Monterey, CA 93940 Phone | 831 648 7000 Fax | 831 373 2625 www.montereyairport.com



To make room on the south side of the airfield for a new relocated commercial terminal complex, the existing General Aviation hangars located southeast of the existing aircraft rescue and firefighting (ARFF) building would be relocated to the north side of the airfield adjacent to Runway 10L-28R. The existing ARFF building would also need to be relocated to another area on the south ramp to make room for the commercial terminal apron. All of these project components would be phased over approximately ten years in the following order:

- Phase 1: General Aviation hangar relocation from the southeast part of the Airport to north of the airfield and potential property acquisition or easement to allow for a Highway 68 frontage road;
- Phase 2: Construction of the new Commercial passenger terminal complex (including apron, and taxilanes, terminal access road, and automobile parking) and south side frontage road; ARFF building demolition and construction of a temporary ARFF facility;
- Phase 3: Demolition of the existing terminal building and construction of a new relocated ARFF building;
- Phase 4: Shift Taxiway "A" to 327.5 feet from Runway 10R-28L (including connector taxiways "G" and "J").

Figure 3 shows the buildings and pavement on the south side of the airport, existing and proposed; Figure 4 depicts the phasing of the entire safety enhancement project.

Because the proposed project has the potential to affect the environment, the District is currently preparing an Environmental Assessment (EA) on the proposed safety enhancement project pursuant to the requirements of Section 102(2) of the *National Environmental Policy Act (NEPA) of 1969*. The EA will conform to the requirements and standards set forth by the Federal Aviation Administration (FAA) as contained in FAA Order 1050.1F: *Policies and Procedures for Considering Environmental Impacts* and FAA Order 5050.4B: *National Environmental Policy Act Implementing Instructions for Airport Actions*. The FAA is the Lead Agency for the project under NEPA.

Therefore, the purpose of this letter is to solicit your comments or concerns regarding potential environmental impacts of the proposed project. **Please provide written comments regarding this project to the physical address, email address, or website\* listed below by 5:00 PM, December 20, 2016.**

**Mailing/Physical Address:** Monterey Peninsula Airport District  
Planning & Development Department  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940  
Attn: Chris Morello

**Email Address:** [planning@montereyairport.com](mailto:planning@montereyairport.com)

Ms. Louise Miranda-Ramirez  
November 3, 2016  
Page 3 of 3

**\* Comments on the EA can be submitted by 5:00 PM, December 20, 2016, using the Comments tab of the project website, which can be accessed from the Airport website at: [www.montereyairport.com](http://www.montereyairport.com) using the “Click Here for Airport Projects In-Progress” box and then choose the “Environmental Assessment (EA) for the Proposed Airport Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations” link.**

A Public Information Workshop will be held at the Airport’s Board Room on the second floor of the Airport Passenger Terminal Building at 200 Fred Kane Drive, Monterey, CA 93940 on **December 6, 2016, from 4 - 6 PM**. Agencies and other interested parties are invited to attend and submit comments regarding the preparation of the EA at that time. The workshop will be held in an “open house” format; no formal presentation will be provided.

If you have any questions or need additional information, please contact the Planning and Development Department at (831) 648-7000, Ext. 208.

Sincerely,

A handwritten signature in blue ink that reads "Chris Morello". The signature is fluid and cursive, with a long horizontal stroke at the end.

Chris Morello  
Senior Manager – Planning and Environment

Enclosures

CC: Doug Pomeroy, Environmental Protection Specialist, FAA Western-Pacific Region, San Francisco Airports District Office  
Judi Krauss, Environmental Planner, Coffman Associates



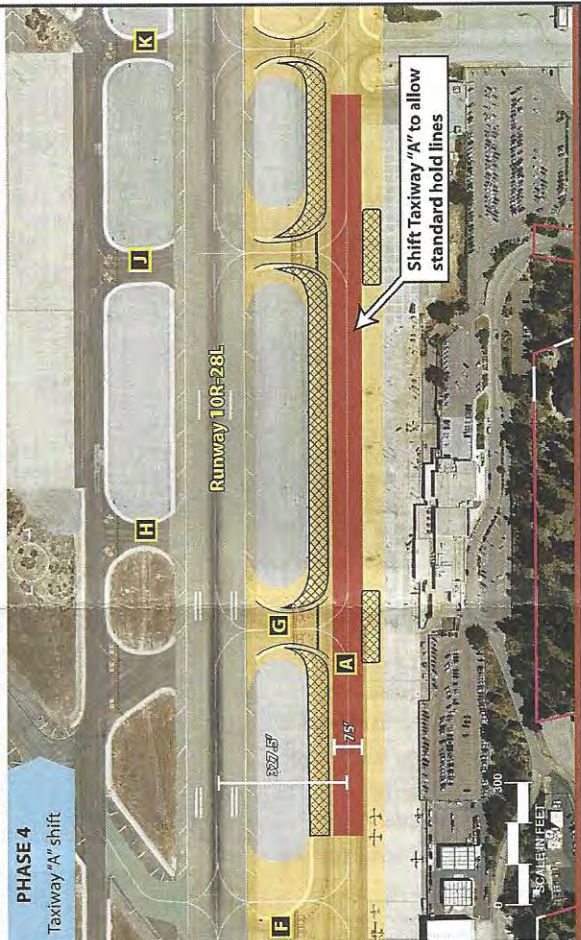
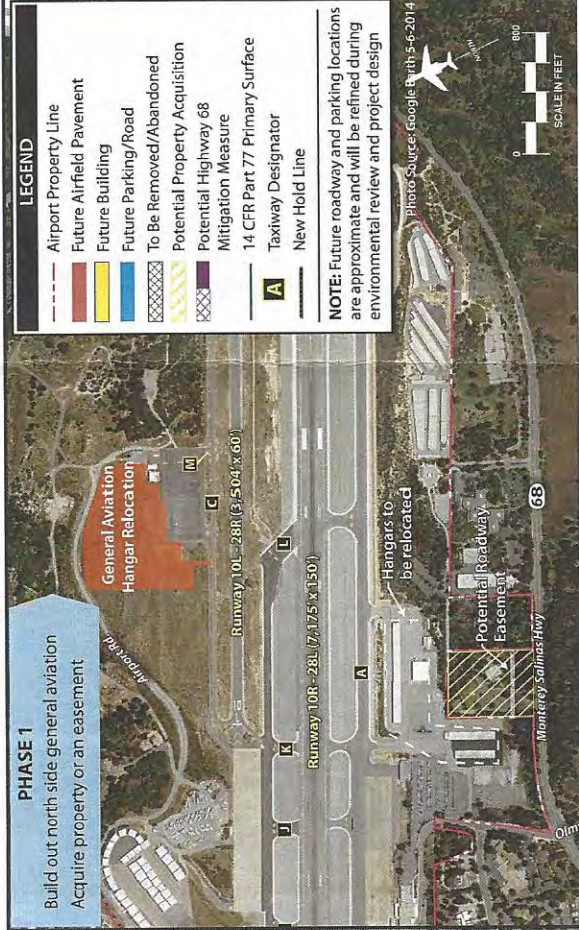
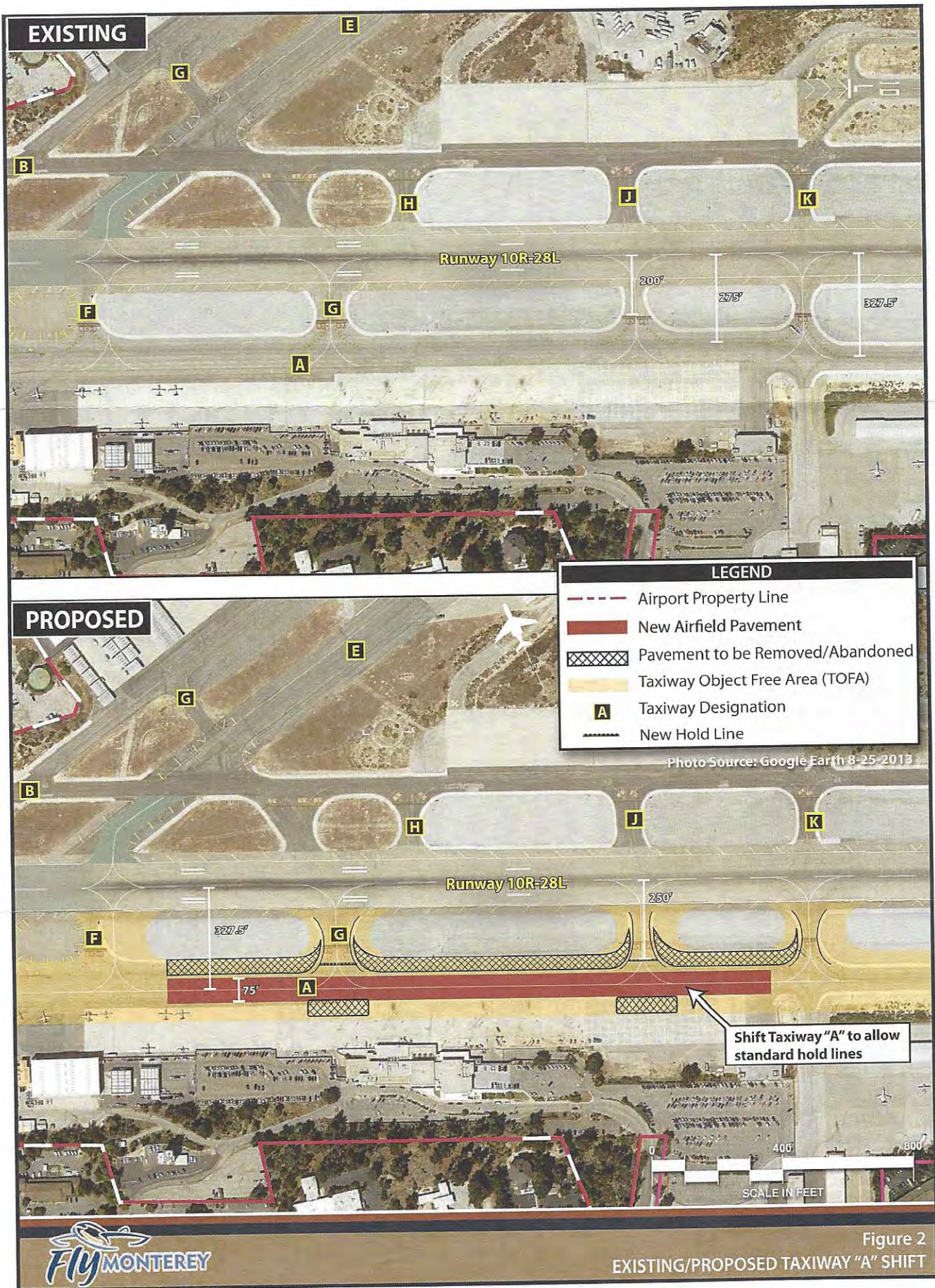


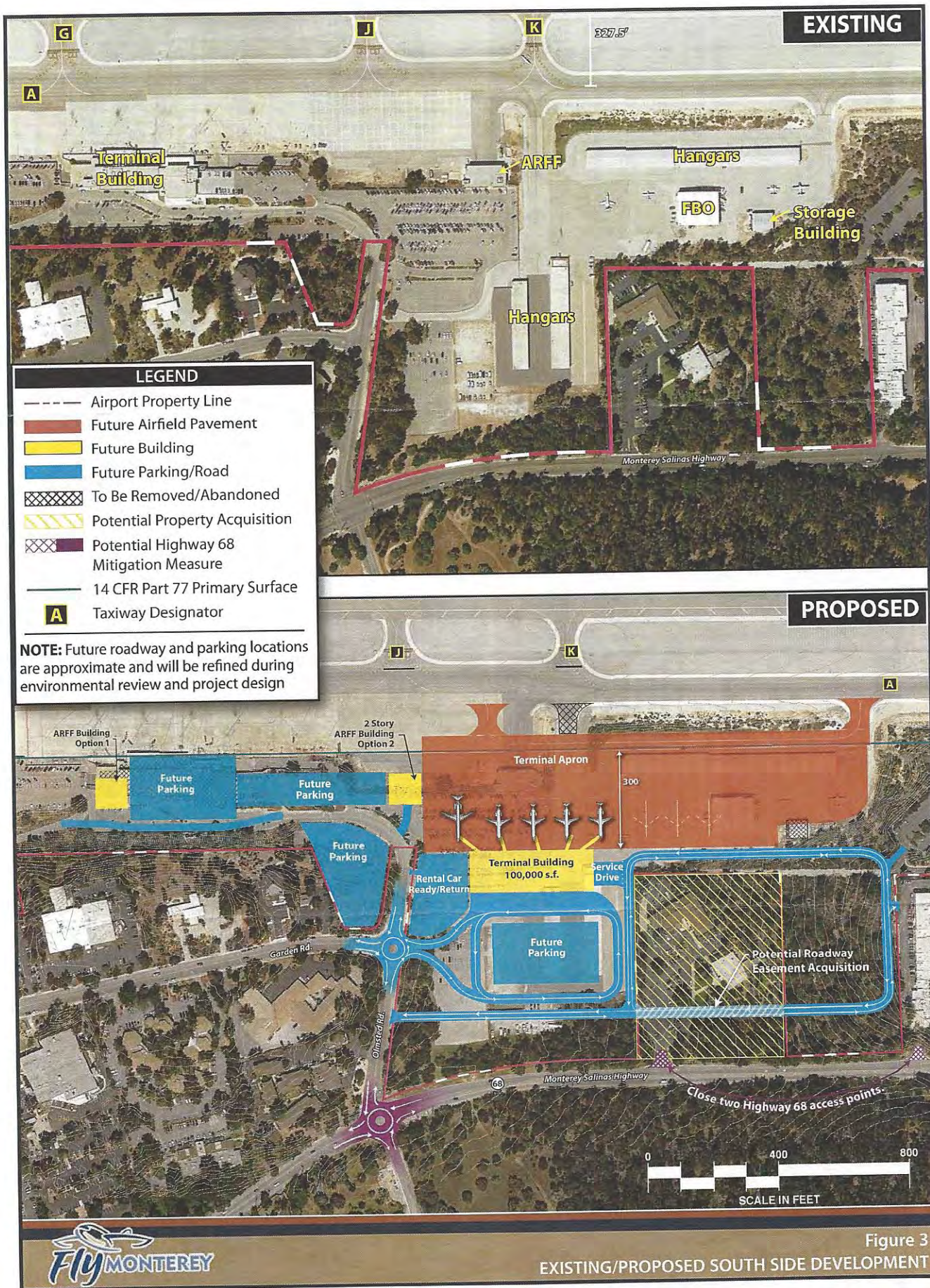
Figure 4  
PROPOSED PROJECT PHASING

FLY MONTEREY











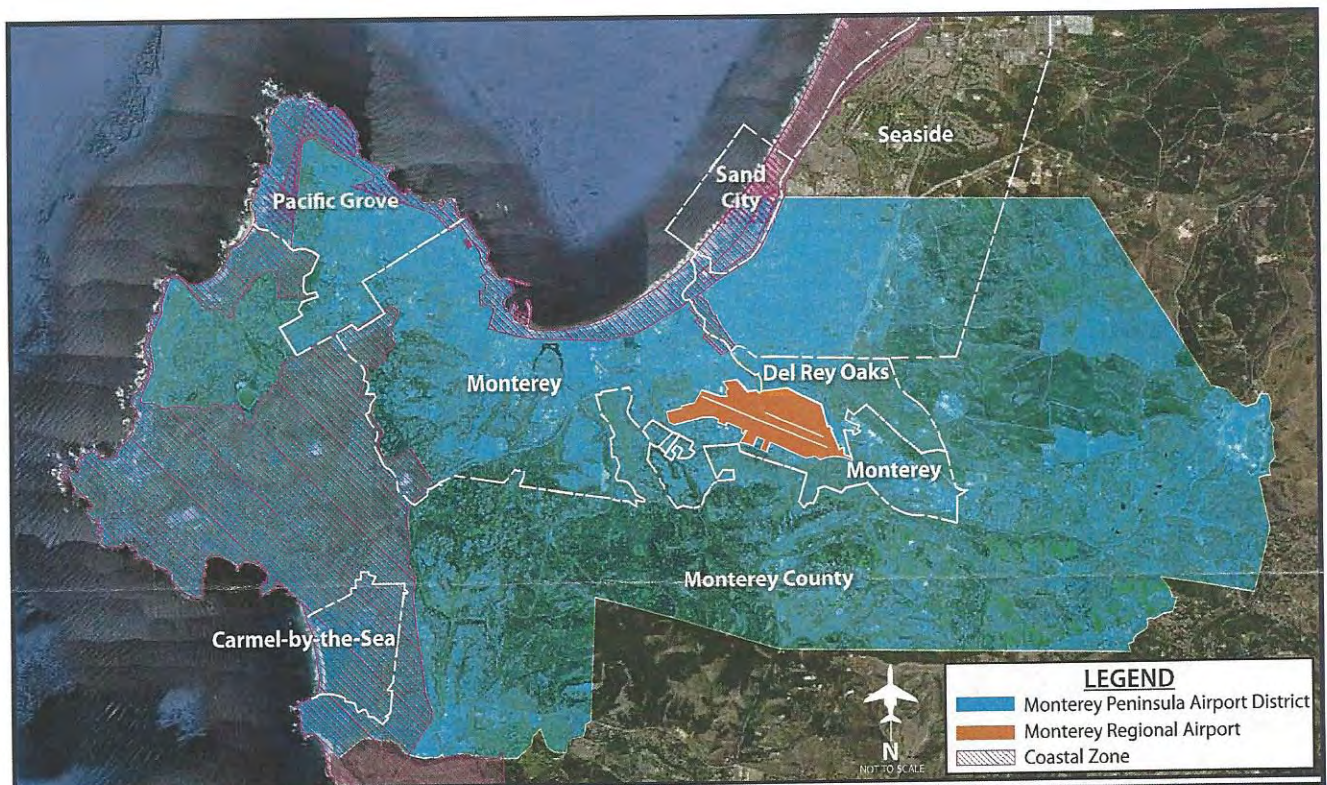
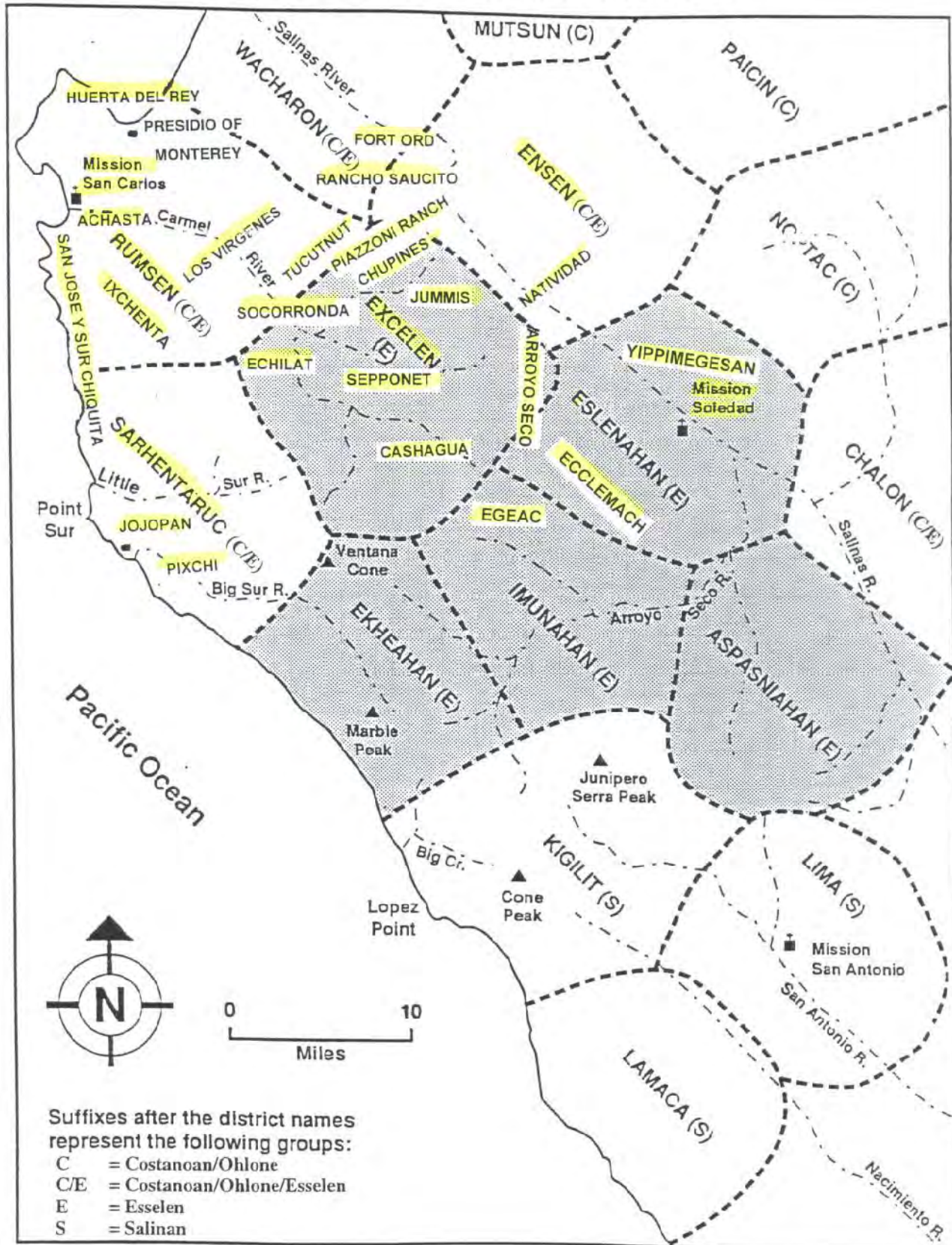


Figure 1  
VICINITY/LOCATION MAP



# Distribution of Ohlone/Costanoan-Esselen Nation Tribal Rancherías, Districts, Landgrants and Historic Landmarks

## OCEN DIRECT LINEAL DESCENT



**Figure 2:**

Map after Taylor 1856; Levy 1973; Hester 1978; Milliken 1990

**Chris Morello**

---

**From:** Michael La Pier  
**Sent:** Thursday, November 10, 2016 3:27 PM  
**To:** Chris Morello  
**Subject:** FW: MRY Environmental  
**Attachments:** SHQ\_KONICA\_16110912210.pdf

Received  
NOV 10 2016  
Planning and Development  
Monterey Peninsula Airport District

Chris –

For the records.

Mike

**Michael La Pier, A.A.E.**  
Monterey Regional Airport  
200 Fred Kane Drive, Suite 200  
Monterey, California 93940  
(831)648-7000  
[mike@montereyairport.com](mailto:mike@montereyairport.com)  
[www.montereyairport.com](http://www.montereyairport.com)



**From:** Daniel Meier [mailto:Daniel.Meier@allegiantair.com]  
**Sent:** Thursday, November 10, 2016 3:24 PM  
**To:** Michael La Pier <mike@montereyairport.com>  
**Subject:** MRY Environmental

Hello Mike,

We received the attached letter requesting our environmental comments or concerns with these projects. We have none.

-Daniel



Daniel Meier, C.M. | Manager, Airports  
Allegiant Air, LLC  
1201 N. Town Center Dr., Las Vegas, NV 89144  
[Daniel.Meier@allegiantair.com](mailto:Daniel.Meier@allegiantair.com) | [allegiant.com](http://allegiant.com)  
Phone: 702.830.8265 Fax: 702.430.3240

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**From:** Schowalter, Naomi A CIV USARMY CESP (US)  
**To:** [Planning](#)  
**Subject:** RE: Environmental Assessment for Proposed Airfield Safety Enhancement Project at Monterey Regional Airport (File No: 2016-00023S) (UNCLASSIFIED)  
**Date:** Thursday, November 10, 2016 10:58:00 AM  
**Attachments:** [1-26-16 AB884 Letter.pdf](#)

---

CLASSIFICATION: UNCLASSIFIED

Good Morning,

The U.S. Army Corps of Engineers (Corps) has received a letter, dated November 3, 2016, concerning the preparation of an Environmental Assessment for the proposed Airfield Safety Enhancement Project at the Monterey Regional Airport. It appears that this project is a subset of the proposed activities presented to the Corps in the "Initial Study for the Monterey Regional Airport Master Plan," dated December 2015. The Corps responded to this previous request for comments in the attached letter, dated January 26, 2016. Please regard this letter as the Corps' response to your request for comments on the proposed Airfield Safety Enhancement Project.

Sincerely,

Naomi Schowalter  
Regulatory Project Manager  
U.S. Army Corps of Engineers  
San Francisco District, South Branch  
415-503-6763 (office)

CLASSIFICATION: UNCLASSIFIED

---

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SAN FRANCISCO, CALIFORNIA 94103-1398

JAN 30 2016

Regulatory Division (1145b)

SUBJECT: File Number 2016-00023S

Ms. Shelley Glennon  
Planning & Development Department  
Monterey Peninsula Airport District  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940

Dear Ms. Glennon:

This letter is written in response to a request for comments on the "Notice of Preparation for an Environmental Impact Report & Notice of Scoping Meeting" and "Initial Study" concerning the proposed "Monterey Regional Airport – Airport Master Plan Project" as described in the notice from the Monterey Peninsula Airport District dated December 28, 2015. Your project is located near freshwater wetlands at Monterey Regional Airport in the City of Monterey, Monterey County, California. Since this activity may involve the discharge of fill into wetlands and, therefore, impact a water of the U.S., the Corps of Engineers will need to review those portions of your project.

All proposed work and/or structures extending bayward or seaward of the line on shore reached by mean high water (MHW) in tidal waters, or ordinary high water in non-tidal waters designated as navigable waters of the United States, must be authorized by the Corps of Engineers pursuant to Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. Section 403). Additionally, all work and structures proposed in unfilled portions of the interior of diked areas below former MHW must be authorized under Section 10 of the same statute.

All proposed discharges of dredged or fill material into waters of the United States must be authorized by the Corps of Engineers pursuant to Section 404 of the Clean Water Act (CWA) (33 U.S.C. Section 1344). Waters of the United States generally include tidal waters, lakes, ponds, rivers, streams (including intermittent streams), and wetlands.

Your proposed work appears to be within our jurisdiction and a permit may be required for your project. Application for Corps authorization should be made to this office using the application form in the enclosed pamphlet. To avoid delays it is essential that you enter the File Number at the top of this letter into Item No. 1 of the application. The application must include plans showing the location, extent and character of the proposed activity, prepared in accordance with the requirements contained in this pamphlet. You should note, in planning your project,



that upon receipt of a properly completed application and plans, it may be necessary to advertise the proposed work by issuing a Public Notice for a period of 30 days.

If an Individual Permit may be required, it will be necessary for you to demonstrate to the Corps that your proposed fill is necessary because there are no practicable alternatives, as outlined in the U.S. Environmental Protection Agency's Section 404(b)(1) Guidelines. A copy is enclosed to aid you in preparation of this alternative analysis. You are advised to refrain from starting your proposed activity until we complete our review of your application and issue you the required authorization.

Commencement of work before you receive our notification will be interpreted as a violation of our regulations.

The Corps regulatory program supports the national goal of "no overall net loss" of wetlands. For permitted activities that result in unavoidable losses, the Corps requires replacement wetlands to offset those losses. The U.S. Army Corps of Engineers and U.S. Environmental Protection Agency released a new Compensatory Mitigation Rule on April 10, 2008, to clarify how to provide compensatory mitigation for unavoidable impacts to the nation's wetlands and streams. A copy of this rule can be found on our Headquarters website: [http://www.usace.army.mil/Missions/CivilWorks/RegulatoryProgramandPermits/mitig\\_info.aspx](http://www.usace.army.mil/Missions/CivilWorks/RegulatoryProgramandPermits/mitig_info.aspx) The new rule changes where and how mitigation is to be completed, but maintains existing requirements on when mitigation is required. The rule also preserves the requirement for applicants to avoid or minimize impacts to aquatic resources before proposing compensatory mitigation projects to offset permitted impacts. Regulatory Guidance Letter 08-03 in the enclosed pamphlet provides guidance on minimum monitoring requirements for compensatory mitigation projects, including the required minimum content for monitoring reports.

The Corps of Engineers receives thousands of requests each year to perform wetland delineations for potential applicants for permits under Section 404 of the Clean Water Act. Due to limited staff and resources, response time can be several months or longer. To expedite this process, the San Francisco District encourages applicants to use consultants to conduct wetland delineations, especially for large and/or complex areas. The San Francisco District is not authorized to recommend any private consulting services and advises applicants to check references and referrals of prospective consultants before contracting services.

You may refer any questions on this matter to Naomi Schowalter of my Regulatory staff by telephone at 415-503-6763 or by e-mail at [naomi.a.schowalter@usace.army.mil](mailto:naomi.a.schowalter@usace.army.mil). All correspondence should be addressed to the Regulatory Division, South Branch, referencing the file number at the head of this letter.

ORIGINAL SIGNED  
BY Katerina Galacatos  
CHIEF, REG. DIV., SOUTH BR.  
FOR

Tori White  
Acting Chief, Regulatory Division

Enclosures

Copy Furnished (w/out enclosures):

CA DFW, Monterey, CA  
CA RWQCB, San Luis Obispo, CA

CF:

CESPN-R (Rdg File)  
CESPN-R-S (SCHOWALTER)

SCHOWALTER/vm  
CESPN-R-S  
415-503-6763 78  
22 Jan 2016

GALACATOS 18  
CESPN-R-S

WHITE  
CESPN-R



**From:** Barbara Lovero  
**To:** [Planning](#)  
**Subject:** comments to planning meeting regarding Environmental Assessment  
**Date:** Tuesday, December 13, 2016 1:20:25 PM

---

Dear Sir:

This is my comment regarding expansion of the Monterey Airport.

I am against any type of expansion since it will result in additional flights flying in and out of the airport, and potentially allowing larger planes to land. Although not specifically stated that more flights will be added, I can not believe the airport would go through the time and expense to do an environmental review and not expand plane volume.

Adding additional flights and/ or bigger planes to the airport would be completely unfair and cause more stress to the surrounding neighborhoods because of the extreme noise level. The airport was developed as a regional airport and should not be in competition with SFO or San Jose. Any expansion will result in a lot more noise.

Given the fact that the FAA changed flight patterns at Monterey airport which caused neighborhoods to endure noisy planes flying over their houses, any more flights or larger planes will be unbearable.

What should be considered is closing down the Monterey airport, which is in the middle of the city and surrounded by houses and expanding the Salinas airport, which is very accessible to all residences in Monterey county.

Sincerely,  
Barbara Lovero



---

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MONTEREY REGIONAL AIRPORT  
ENVIRONMENTAL ASSESSMENT  
SCOPING COMMENT FORM



Meeting: Scoping Meeting regarding the EA for the Proposed Airport Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations Date: December 6, 2016 Time: 4:00 - 6:00 p.m.  
Place: MPAD Board Room

Name /Address: Doug FLAHERTY [REDACTED]  
Phone # / Email: [REDACTED]

*Please Print Neatly*

How about a road on the NE side of the airport into Del Rey Oaks? People that have businesses coming from SNS could go that way instead of the residential area at the intersection of Canyon del Rey and Fremont Street.

Thank you, Doug

**ALL COMMENTS MUST BE SUBMITTED IN WRITING.**

Written comments will be accepted until 5 p.m. (PST), December 20, 2016, at the following address:

Monterey Peninsula Airport District  
Planning & Development Department  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940

or  
planning@montereyairport.com

Additional information is available on the Monterey Airport Website at: [www.montereyea.airportstudy.com](http://www.montereyea.airportstudy.com) by clicking on "Airport Projects In-Progress"



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Ventura Fish and Wildlife Office  
2493 Portola Road, Suite B  
Ventura, California 93003



IN REPLY REFER TO:  
08EVEN00-2017-CPA-0027

December 16, 2016

Chris Morello  
Monterey Peninsula Airport District  
Planning and Development Department  
200 Fred Kane Drive, Suite 200  
Monterey, California 93940

Subject: Comments on Monterey Regional Airport Safety Enhancement Project

Dear Ms. Morello:

We have reviewed your letter, dated November 3, 2016 and received in our office on November 7, 2016, requesting comments on the Monterey Regional Airport Safety Enhancement Project. The Monterey Peninsula Airport District is proposing to improve safety at the Monterey Regional Airport, Monterey County, California, by relocating a portion of Taxiway A to provide a consistent 327.5-foot centerline to centerline separation between the primary runway and the parallel taxiway located on its south side as recommended in the Draft Airport Master Plan. Relocating the taxiway would also require demolition and relocation of the existing commercial terminal, to allow sufficient separation for aircraft parking and airport vehicle movement between the terminal and the realigned taxiway. A new commercial terminal complex would be constructed east of the current terminal, other buildings and automobile parking areas would be relocated, and a Highway 68 frontage road would be constructed which would require either potential property acquisition or easement.

You have requested our comments regarding potential environmental impacts of the proposed project to assist with your preparation of an Environmental Assessment under the National Environmental Policy Act (NEPA), and indicated that the Federal Aviation Administration will be the Lead Agency for the project under NEPA.

The mission of the U.S. Fish and Wildlife Service (Service) is working with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people. To assist in meeting this mandate, the Service provides comments on public notices issued for projects that may have an effect on those resources, especially federally-listed plants and wildlife. The Service's responsibilities also include administering the Endangered Species Act of 1973, as amended (Act). Section 9 of the Act prohibits the taking of any federally listed endangered or threatened wildlife species. "Take" is defined at Section 3(19) of the Act to mean "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." The Act provides for civil and criminal penalties for the unlawful

taking of listed wildlife species. Such taking may be authorized by the Service in two ways: through interagency consultation for projects with Federal involvement pursuant to section 7, or through the issuance of an incidental take permit under section 10(a)(1)(B) of the Act.

Our review of the proposed project indicates that the area that would be affected may support the following listed species:

<u>Common name</u>	<u>Scientific Name</u>	<u>Threatened or Endangered</u>
Monterey gilia	<i>Gilia tenuiflora</i> ssp. <i>arenaria</i>	Endangered
Monterey spineflower	<i>Chorizanthe pungens</i> var. <i>pungens</i>	Threatened
Yadon's piperia	<i>Piperia yadonii</i>	Endangered

We recommend that focused surveys for these species be conducted as soon as possible in the appropriate season, following acceptable protocols, if they have not already been completed. If any of these species are detected or are known to be present in the project area, please contact us to help determine what measures may be appropriate to conserve the species and their habitats. We can also provide guidance on the steps that may be needed to comply with the Act.

If you have any questions, please contact Mark Ogonowski of my staff at (805) 644-1766, extension 370, or by electronic mail at: mark\_ogonowski@fws.gov.

Sincerely,

Glen W. Knowles  
Assistant Field Supervisor



December 19, 2016

Monterey Peninsula Airport District  
Planning & Development Department  
Att: Mr. Chris Morello  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940

VIA: Email to [planning@montereyairport.com](mailto:planning@montereyairport.com)

**RE: Environmental Assessment for Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations at Monterey Regional Airport, Monterey County, CA**

Dear Mr. Morello:

Monterey County Farm Bureau represents family farmers and ranchers in the interest of protecting and promoting agriculture throughout our County. We strive to improve the ability of those engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of our local resources.

In past communications with the Airport District, Monterey County Farm Bureau has been supportive of expanded service capacity at the Monterey Regional Airport, including additional service destinations to enhance travel opportunities for agricultural firms doing business in southeastern California and southwestern Arizona.

We find the proposed plan for safety enhancements and terminal building projects supportive of this goal. After review of the environmental assessment, the plan for these changes are necessary for the continued safe operation of the regional airport, and indeed, for the expansion of capacity for future operations.

Reviewing the proposed changes to traffic patterns in the area of the regional airport, we concur with the proposed entrance to the terminal area coming off Olmsted Road. This access will focus the airport traffic patterns off Highway 68 and avoids the creation of another intersection point on Highway 68 where traffic must access the airport area.

While our organization is not a fan of traffic circles as a method of traffic management, we see the need to keep traffic flowing into the airport at the intersection with Garden Road; in this case a traffic circle might be helpful to keep traffic moving freely. We do not support the installation of a traffic circle at the intersection of Highway 68 and Olmsted Road; this is a too highly traveled route of both private and commercial traffic to impose a traffic circle upon.





We concur also with the proposed closure of the two Highway 68 access points as proposed on Figure 3-Existing/Proposed South Side Development. This will provide a smoother flow of traffic in the general area between the Highway 1 interchange and Canyon del Rey Blvd.

As to the options of either the potential property acquisition or the potential roadway easement acquisition, for simplistic sake we urge the first option being the roadway easement. We see this property as still being viable under private ownership with new access points included in the easement roadway construction.

Safety enhancements are paramount for the Monterey community as the airport continues to service the needs of the region. Delays in constructing needed enhancements for runways, taxiways, and terminal capacity are undesirable. We urge working together as a community to make airport operations as safe as possible, including requirements imposed by state and federal agencies. Without these safety improvements, the entire community is at risk should there be a catastrophic event caused by inadequate or unsafe airport facilities.

These airport enhancements will lead to the overall goal of improving capacity, enhanced destinations, and desirability of airlines to offer additional service to the Monterey region.

We urge this phased program for airport improvements to move forward, as proposed in the environmental assessment.

Thank you for the opportunity to provide comments.

Sincerely,

Norman C. Groot  
Executive Director



December 19, 2016

Michael La Pier, Executive Director  
Chris Morello, Senior Planner-Planning and Environment  
Monterey Regional Airport  
200 Fred Kane Drive, Suite 200  
Monterey, Calif. 93940

Subject: Environmental Assessment for Proposed Airfield Safety Enhancement Project:

Dear Mr. La Pier

The Casanova Oak Knoll Neighborhood Association appreciates the opportunity to comment on the District's implementation of your Master Plan Environmental Assessment. Our neighborhood concerns are:

1. Please reference our comments submitted February 3, 2016 regarding the Airport Master Plan. Many of the issues stated in the letter also apply to the EA.
2. Our concerns continue on increase traffic through our residential area and our continued requests for joint funding towards our traffic calming projects. Particular attention to Stuart Avenue and complaints from their residents of commercial traffic using their street as a shortcut. We implemented a partial street closure which has ceased to be effective as more vehicles drive the wrong way on a one way street. We have received a unanimous petition from these residents for a full street closure. State law requires a comprehensive traffic count study which the Monterey Neighborhood Improvement Program funded last year. This year full construction costs will be requested. It requires extensive ADA requirements including moving a power pole. These solutions are needed as a direct impact from Airport District Property. Increased cumulative traffic is creating a public safety issue on residential streets. Staffing issues at the Monterey Police Department has been a major issue with us on lack of enforcement against speeding cars.
3. The future effects of N. Fremont Streets upcoming two years of major construction should be addressed in the EA. The Cal Am pipeline, and the \$7 million grant for pedestrian and bicycle improvements. Our concern is the increase in neighborhood bypass traffic because of the N. Fremont projects and/or the proposed Airport District construction.
4. We request that all new development on the North side of the Airport be conditional on the opening of new access roads before any construction begins. The new access routes should be used in cases of mutual assistance from adjacent Public Safety agencies.
5. We request a card key gate be installed between new development on the New North side and the Old North side, this gate should allow only public safety vehicles.
6. We request that all fuel depots and filling of tanks all take place on Airport property.

In summary, commercial traffic through residential streets has been a major issue here for decades. The City of Monterey has installed major traffic calming elements to alleviate impacts. The program is far from complete. The Monterey Police Department does not have an active staffed Traffic Division. Speed enforcement is seldom implemented. An alternate controlled alternative access entrance to the Airport North side property is needed before any new development starts construction. The current level of service of N. Fremont Street at peak hour is at gridlock. The next two years of N. Fremont construction is going to place an enormous burden on our residential streets.

The City of Monterey is in the process of completing a traffic study which we encourage the Airport District to participate in.

Please contact me if you would like to discuss any of this issues in detail.

Sincerely,

Richard Ruccello, CONA president



# CASANOVA OAK KNOLL NEIGHBORHOOD ASSOCIATION

PO BOX 2304, Monterey, CA 93942

Fax 831-375-3465 • Email conamonterey@aol.com

February 3, 2016

Monterey Airport District  
Scoping Meeting on EIR for Airport Master Plan  
Monterey Peninsula Airport Board of Directors

RECEIVED

FEB 03 2016

MONTEREY PENINSULA  
AIRPORT DISTRICT

2:10 PM MG

Dear Board members:

The information provided below are comments received from residents of Casanova Oak Knoll Neighborhood Association members regarding your pending Master Plan. These are initial comments, many of which we will go into detail at a future date.

## EIR Lacks Analysis of Early-Turn and Take-Off Operations and Public Safety Considerations

### Early-Turn and Take-Offs Authorized by FAA

The FAA changes now permit early-turn and take-offs, which allow aircraft to take-off before reaching the end of the runway, and depart at an angle, sideways from the runway. Aircraft can now depart the runway early, turn and climb away at any point.

Take-offs such as these do not make use of the existing crash safety zone at the ends of the runway. This is not clearly explained in the EIR.

The EIR focuses on runway centerline take-offs using safety zones at either end of runways 28L and 28R. A center-line take-off affords a climbing aircraft a ground distance of over 6,000 feet of clear safety zone to climb out over. These operations and flight profiles are discussed in the EIR.

Runway 10L-28R is heavily used by general aviation operators, accounting for approximately 50% of total airport operations (page 6/3 Errata Chapter 6

### Public Safety Concerns Not Addressed

Early-turn and take-offs from Runway 28L place turning/climbing aircraft immediately over on-site commercial buildings, aircraft operations and storage. After a ground distance of approximately 1,000 to 1,800 feet, aircraft are still climbing, turning and transitioning at low altitude but now over a residential neighborhood. This is a significant change to aircraft operations which is not addressed in the EIR.

These operations have departing aircraft climbing and turning at low altitude over a residential neighborhood with a preschool and some of the highest density multi-story housing in the City of Monterey. This endangers public safety and adversely impacts the well-being of residents. The operation of two pre-schools in the neighborhood needs to be mentioned and addressed according to Federal guidelines on height of Airport over these facilities. Noise and ground safety issues need to be addressed.

### Impacts to North Side Development Not Adequately Addressed

The EIR does not adequately address possible safety concerns to existing and proposed on-site airport development adjacent to and north of Runway 28R.

The two access points designated in the EIR does not address the contingency that the Canyon Del Rey access not be built because of Del Rey Oaks withdrawing its consent, engineering costs may be too high and the same for construction costs. What is the alternative to development if Airport Road is the only option?

A description of planned future use, size of buildings, height of buildings, and number of vehicles generated each day. The EIR needs to consider the type of vehicles, weights of vehicles, cars, trucks, semi-trucks, and/or construction vehicles.

What are the proposed mitigations for this traffic passing through residential streets?

If there is an increase in traffic, the mitigations need to address the current situation on N. Fremont at peak hours. This long standing gridlock is seeing vehicles transiting through the back of our neighborhood to avoid the stoplights on N. Fremont. The Monterey Neighborhood Improvement Program has spent large sums of its budget on traffic calming addressing these issues. The Monterey Airport District generates about 20% of this impact, but needs to contribute accordingly to the solutions. This also applies to current drainage from the Airport property and in particular to the new growth (paving) in the Plan.

The EIR does not address the issue of proposed land use development on the north side also being over flown at low altitude by aircraft departing using early-turn and take-offs. Extensive new buildings, aircraft storage, non-aviation related commercial development, and a new larger fuel depot are proposed for the north side of the airport.

Our last point is in regards the two proposed access points for vehicles. As we read the EIR we see that vehicles have the option of using the Canyon Del Rey access point or Airport Road. In previous years planning meetings a card/key gate was shown between the New Northside and the Old Northside. All new traffic would be using Canyon Del Rey, only public safety vehicles were to use the card gate.

Logistically the majority of the destinations of vehicles would be to the Peninsula, thereby using Airport Road as the shortest, fastest route. This is unacceptable to our neighborhood. This is not discussed in the Master Plan. CONA requests a search of Airport documents showing the maps with this promised gate, and the inclusion of these documents in the Master Plan.

Sincerely,



Richard Ruccello, CONA president



December 19, 2016

Attn: Christine Morello  
**Monterey Peninsula Airport District**  
Planning & Development Department  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940

Dear Ms. Christine Morello,

In response to your letter dated November 3, 2016 asking for affected parties to provide written comments regarding the proposed airport project, I offer the following:

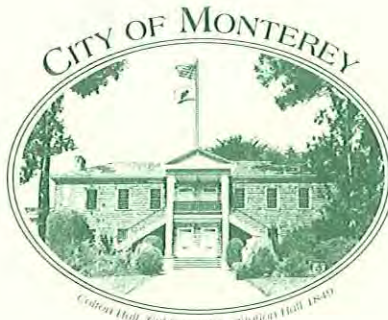
Robert Talbott, Inc., located at 2901 Salinas Highway has an existing egress and ingress onto Highway 68. The company has two buildings on two separate APN #'s with a specific traffic pattern that facilitates the shipping and receiving of goods to the warehouse. According to the proposed changes, that traffic pattern will be adversely affected making it nearly impossible to ship and receive product.

Please advise how the airport district intends to deal with this significant negative impact on our company.

Sincerely,

Robert J. Corliss  
Chairman & CEO

Robert S. Talbott  
Lanlord



Received

DEC 20 2016

Planning and Development  
Monterey Peninsula Airport District

December 20, 2016

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

Subject: Environmental Assessment for Proposed Airfield Safety Enhancement Project

Dear Mr. La Pier:

The City of Monterey appreciates the opportunity to provide comments to the Environmental Assessment (EA) associated with the proposed Airfield Safety Enhancement Project. The City of Monterey understands and supports the airport's efforts to increase safety as it relates to Taxiway A and the existing airport terminal. The development of a new terminal will be a positive addition to the Monterey Regional Airport, and will benefit both the airport and those using the airport's services. The City of Monterey supports the comprehensive improvements envisioned in the Master Plan, including those associated with the Airfield Safety Enhancement Project, to help the airport prepare for the future of aviation on the Monterey Peninsula. Actively pursuing a new north side access road from Del Rey Gardens Drive is a vital key in helping to ensure the overall safety of the airport operations while minimizing the environmental impacts to the residents of the Casanova/Oak Knoll Neighborhood in Monterey.

The City of Monterey respectfully submits the following comments as it relates to the proposed improvements in conjunction with the Airfield Safety Enhancement Project:

### **1. North Side Development**

In response to the following concerns, the City of Monterey requests that the EA require the development of a new primary access road to the north side of the airport as a mitigation measure to the anticipated noise, traffic and safety impacts associated with the project, as envisioned and addressed in the Airport's Master Plan. This new access road would connect to Del Rey Gardens Drive and thereby provide a direct connection to Highway 218 and a much shorter, direct connection to Highway 68 than does Airport Road.

- Without a north side connection to Del Rey Gardens, the relocation of the general aviation hangers to the north side of the airport would raise concerns as it relates to traffic and noise impacts to the Casanova/Oak Knoll Neighborhood. At this time, the sole access road to the north side of the airport is via Airport Road which runs directly through the adjacent residential neighborhood. Relocating the general aviation hangers to the north side of the airport is anticipated to result in a significant increase in vehicular traffic to the detriment of the residents, which could be mitigated by construction of the north side connection to Del Rey Gardens.



- In the case of an emergency, vehicle access to and from the north side of the airport is currently limited to Airport Road. While the airport maintains an on-site aircraft rescue and firefighting (ARFF) force and facility, a significant event on the north side of the airport would require first responder mutual aid assistance. Limiting access to the north side of the airport solely by Airport Road could significantly impact first responder efforts. Construction of the north side connection to Del Rey Gardens is critical to providing acceptable emergency response to the Airport north side.
- Per FAA guidelines, airport lands are to be used for aviation-related purposes. While the proposed relocation of the general aviation hangers to the north side of the airport is consistent with this guideline, the City anticipates that the number and size of vehicles that would require access to the north side of the airport in support of the general aviation uses would be considerably greater on Airport Road than would be anticipated with non-aviation uses (e.g. professional or military research facilities, office park uses, etc.) to the detriment of the residents adjacent to Airport Road. Construction of a new access road connecting the Airport north side to Del Rey Gardens Drive would provide a more direct connection to Highway 218 and Highway 68 than does Airport Road. Construction of the north side connection to Del Rey Gardens would lessen the volume of traffic using Airport Road and mitigate additional airport traffic that would otherwise travel through the Casanova Oak Knoll Neighborhood in Monterey.
- The environmental document should consider the issues of locating a new large fuel depot on the north side of the airport. What will be the fuel delivery route to the tanks? What are the increased hazards to the adjacent Casanova/Oak Knoll neighborhood?
- Consider traffic generation between the new and older north side. Will additional trips traverse the Casanova/Oak Knoll neighborhood? Will the airport consider a key gate to prevent additional trips?

## **2. Terminal Relocation**

The City of Monterey requests that the EA evaluate the visual impacts to Highway 68 associated with the removal of existing trees along Highway 68, the development of a multi-story parking facility on the south side of the airport and the development of the frontage road running parallel to the designated Scenic Highway. The relocation of the passenger terminal to accommodate the relocation of Taxiway A will result in the need to relocate the ARFF building, and to develop new parking facilities. A new circulation plan, including a new south side frontage road, is proposed under the EA. The City of Monterey supports the circulation improvements for the new terminal, including a proposed roundabout controlled intersection at Olmstead Road and Garden Road. In anticipation of increased patronage of the airport and to improve traffic flow, a roundabout is also proposed at the intersection of Highway 68 and Olmstead Road.

## **3. Consider capacity and location of all utilities**

The City of Monterey requests that the EA consider those impacts and upgrades that will be required to the existing water, storm and sewer infrastructure in conjunction with the project.

In summary, the City of Monterey believes that the improvements envisioned in the Master Plan, including those associated with the Airfield Safety Enhancement Project, will help the airport prepare for the future of aviation on the Monterey Peninsula. Actively pursuing a new north side access road from Del Rey Gardens Drive is a vital key in helping to ensure the overall safety of the airport operations while minimizing the environmental impacts to the residents of the Casanova/Oak Knoll neighborhood.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Roberson". The signature is fluid and cursive, with a large initial "C" and "R".

Clyde Roberson, Mayor



December 20, 2016

Michael La Pier, Executive Director  
Chris Morello, Senior Planner-Planning and Environment  
Monterey Regional Airport  
200 Fred Kane Drive, Suite 200  
Monterey, Calif. 93940

Subject: Comments on Environmental Assessment for Proposed Airfield Safety Enhancement Project:

**The Airport is increasing risk to its own operations and increasing risks to public safety, from a domino effect of relocating operations to the north, to improve runway safety.**

The North Fremont Street corridor is experiencing stop-and-go traffic circulation. Airport Road is heavily congested from year-round events at the Monterey Fairgrounds. The adjacent Casanova Oak Knoll neighborhood is impacted by cut-through traffic attempting to bypass North Fremont Street grid-lock and congested fairgrounds event traffic.

Relocating existing operations and increasing land use and commercial activity on the north side will generate additional traffic into an already congested traffic system, with one point of access to the Airport.

By relocating and increasing land-use development which will increase traffic in an already congested area, the Airport is negatively impacting its mutual response system used for responding to emergencies.

The Airport should offset the impacts to their mutual support based emergency response, by:

- mitigating impacts to traffic on North Fremont Street, Airport Blvd and the Casanova Oak Knoll area; and,
- provide a second access point located on the north side adjacent to the area of new development; before the Garden Road/Highway 68 improvements, which should be third in order of risk management.

Wise risk management would consider.

- No further development until a second access point is in service on the north side, due to increased risks to mutual aid response.
- The Garden Road - Highway 68 intersection should be considered as a third access point improvement project, since the north side development presents a higher risk having no access point.

In addition, development should be constructed to prevent any new runoff onto adjacent property, to minimize noise and night-time light intrusion and other negative impacts such as industrial odors, etc. to neighboring residential areas.

Robert Yoha



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Appendix C

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***ENDANGERED SPECIES ACT,  
SECTION 7 CONSULTATION***



June 17, 2019

Mr. Steve Henry  
Field Supervisor  
Ventura Fish and Wildlife Office  
U.S. Fish and Wildlife Service  
2493 Portola Road – Suite B  
Ventura, CA 93003

Subject: Initiation of Endangered Species Act, Section 7, Formal Consultation for the Monterey Regional Airport (MRY) Proposed Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations.

Dear Mr. Henry:

The Federal Aviation Administration is initiating Endangered Species Act, Section 7, consultation for the Monterey Regional Airport (MRY) Proposed Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations proposed by the Monterey Peninsula Airport District (MPAD) regarding adverse effects of the project on the federally threatened Monterey spineflower (*Chorizanthe pungens*) and federally endangered Yadon’s piperia (*Piperia yadonii*).

#### Project Information

The Proposed Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations is described in detail on the enclosed Compact District containing the *Biological Assessment for the Monterey Regional Airport Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations, Monterey County, California*, dated December 2018. The MPAD is proposing the construction of a multi-phased safety enhancement project at the MRY that will take a number of years to complete. Currently, an approximately 1,850-foot portion of Taxiway A is located only approximately 275 feet from Runway 10R-28L, as opposed to a 327.5-foot separation distance between the remainder of Taxiway A and Runway 10R-28L.

However, due to limited space a series of construction projects must be completed before Taxiway A can be relocated. Taxiway A cannot be relocated until the existing passenger terminal is demolished; the existing passenger terminal cannot be demolished until a new passenger terminal is constructed and operational; a new passenger terminal cannot be constructed until some existing General Aviation (GA) hangars, aircraft parking apron, and Aircraft Rescue and Firefighting Facility (ARFF) are demolished; the GA hangars and ARFF facilities south of the MRY runways cannot be demolished until their replacements are constructed and operational north of the MRY runways; and the replacement GA hangars and ARFF facility cannot be constructed north of the MRY runways until an



additional access road is provided to the northeast side of the MRY to provide access for construction and subsequent airport tenant access to those areas.

The project components include:

- Increasing the centerline-to-centerline separation distance between Runway 10R-28L and the adjacent parallel Taxiway “A” to a uniform separation distance of 327.5 feet for the entire length of Taxiway “A” by relocating an approximately 1,850-linear-foot (lf) portion of Taxiway “A” south by 52.5 feet. Currently that 1,850-lf portion of Taxiway “A” is only 275 feet from the centerline of Runway 10R-28L.
- Providing apron islands for Taxiways “G” and “J” at their connections with Taxiway “A” to prevent direct access from the adjacent apron to Runway 10L-28R.
- Relocating existing “hold lines” on Taxiway “A” at Taxiways “G” and “J” 50 feet farther from the centerline of Runway 10R-28L so that hold lines that are currently 200 feet from the centerline of Runway 10R-28L will then be 250 feet from the centerline of Runway 10R-28L.
- Replacing the existing approximately 70,000-square-foot (sf) passenger terminal building, constructed in 1950, and the 5.6-acre terminal aircraft parking apron located south of Taxiway “A” between Taxiways “G” and “J” with a relocated approximately 100,000-sf terminal building located south of Taxiway “A” between Taxiways “J” and “K” and an approximate 13.1-acre terminal aircraft parking apron. This relocation is necessary to accommodate the relocation of Taxiway “A.”
- Closing Taxiway “K” so that there will be no direct access via Taxiway “K” from the relocated terminal aircraft parking apron to Runway 10R-28L.
- Removing the existing approximately 3-acre southeast GA apron and hangar area, including approximately 126,000 sf of hangar space, and relocating approximately 44 GA tenants, as the existing southeast GA apron and hangar area would be replaced by the relocated passenger terminal complex and aircraft parking apron. The hangar space would be replaced with approximately 90,500 sf of T-hangar, box hangar, and executive hangar space; buildable hangar pads that could accommodate an additional 35,500 sf of hangar space; and associated infrastructure in the GA hangar area located north of Runway 10L-28R. The north GA apron would be reduced by approximately 1,000 sf to accommodate a new taxi lane, and the southeast GA apron would not be replaced.
- Demolishing the existing aircraft rescue and firefighting (ARFF) building, which is located where the new commercial terminal apron will be constructed, and constructing a new ARFF building on north GA apron.
- Constructing an additional “north side” road to provide access to the northeast side of the Airport, including the north side GA area and the relocated ARFF building, that connects to Del Rey Gardens Drive, which connects to SR 218.
- Providing areas on the north side of the Airport for stockpiling or depositing excess cut material created by the Proposed Action.

#### Effect of the Proposed Project on Listed Species

As described in detail in the Biological Assessment, the proposed project is expected to adversely affect both the federally threatened Monterey spineflower (*Chorizanthe pungens*) and federally endangered Yadon’s piperia (*Piperia yadonii*) by removing habitat where

those species are currently found. No other federally threatened or endangered species, or designated critical habitat, would be adversely affected by the proposed project.

The MPAD proposes to implement the conservation measures identified in Section 6 of the Biological Assessment to address the adverse effects of the project. I request that your office issue a Biological Opinion within 90 days of receipt of this letter although I recognize that in accordance with 50 Code of Federal Regulations Part 402, you have until approximately November 4, 2019 (i.e. within approximately 135 days of receipt of this letter) to provide a Biological Opinion. I also request the U.S. Fish and Wildlife Service staff biologist assigned to this consultation contact me at the e-mail address below to confirm the U.S. Fish and Wildlife Service staff contact at your office for this consultation.

If you have any questions regarding this matter I am available at 650-827-7612, or email me at [Douglas.Pomeroy@faa.gov](mailto:Douglas.Pomeroy@faa.gov).

Sincerely,

*Original signed by*

Douglas R. Pomeroy  
Environmental Protection Specialist

Copy to (w/o enclosure):

Chris Morello, Deputy Director of Strategy and Development, Monterey Peninsula Airport District

Chron            Project File



## United States Department of the Interior

### U.S. FISH AND WILDLIFE SERVICE

Ecological Services  
Ventura Fish and Wildlife Office  
2493 Portola Road, Suite B  
Ventura, California 93003



IN REPLY REFER TO:  
08EVEN00-2019-F-0599

December 23, 2019

Douglas R. Pomeroy  
Environmental Protection Specialist  
San Francisco Airports District Office  
Federal Aviation Administration  
1000 Marina Boulevard, Suite 220  
Brisbane, California 94005-1835

Subject: Biological Opinion for the Monterey Regional Airport Safety Enhancement Project, Monterey County, California

Dear Mr. Pomeroy:

This document transmits the U.S. Fish and Wildlife Service's (Service) biological opinion based on our review of the Federal Aviation Administration's (FAA) proposed authorization to the Monterey Peninsula Airport District (MPAD) to carry out the Safety Enhancement Project (Project) at the Monterey Regional Airport (Airport) and its effects on the federally threatened Monterey spineflower (*Chorizanthe pungens* var. *pungens*) and federally endangered Yadon's piperia (*Piperia yadonii*), in accordance with section 7 of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.). We received your June 17, 2019 request for consultation on June 19, 2019.

We have based this biological opinion on information that accompanied your June 17, 2019 request for consultation, including the biological assessment (SWCA 2018), and additional information provided via email (Morello in litt. 2019). These documents and others relating to the consultation are located at the Ventura Fish and Wildlife Office.

The Service published a final rule on August 27, 2019 (84 FR 44976) that changed the definitions of some of the terms that we use in section 7(a)(2) consultations. The changes became effective on October 28, 2019. We developed this biological opinion in accordance with the changes in the final rule.

#### Consultation History

June 17, 2019            The FAA requested formal consultation on authorization of the subject Project.



- July 17, 2019 The Service acknowledged FAA's request to initiate formal consultation through electronic mail.
- July 24, 2019 The FAA sent additional Project information to the Service through electronic mail.
- November 4, 2019 The Service requested additional time to deliver the biological opinion to incorporate revised portions of Service regulations that implement section 7 of the Endangered Species Act. A later due date of December 7, 2019 was mutually agreed upon.
- November 25, 2019 The Service requested yet another extension until December 13, 2019 to provide the biological opinion to FAA.
- November 26, 2019 The FAA acknowledged the Service's request to extend the due date to transmit the biological opinion.

## BIOLOGICAL OPINION

### DESCRIPTION OF THE PROPOSED ACTION

The MPAD is proposing the Safety Enhancement Project at the Monterey Regional Airport, which includes the following activities over a nine-year period:

- Increase the centerline-to-centerline separation distance between Runway 10R-28L and the adjacent parallel Taxiway A;
- Provide apron islands for Taxiways G and J at their connections with Taxiway A;
- Relocate existing hold lines on Taxiway A;
- Replace the existing approximately 70,000-square-foot passenger terminal building;
- Relocate the existing southeast General Aviation (GA) apron and hangar area;
- Demolish the existing Aircraft Rescue and Firefighting (ARFF) building and construct a new ARFF building on the north GA apron;
- Construct the North Access Road to provide access to the northeast side of the Airport;
- Provide areas on the north side of the Airport for depositing excess cut material created by the Project; and
- Remove invasive and nonnative species using manual and chemical methods to minimize competition with Monterey spineflower and Yadon's piperia in conservation areas.

Further details on the aforementioned activities are available in the biological assessment (SWCA 2018, pp. 5-9) and in Table 1.

**Table 1. Project areas and approximate acreage**

<b>Project Area</b>	<b>Acres</b>
North Access Road and GA Relocation Area	23.20
Parking and Circulation	11.83
Drainage Improvements	1.15
Soil Deposition Areas	25.26
South Side Taxiway A Shift Area	17.20
Proposed Conservation Areas	20.46
<b>TOTAL</b>	<b>99.10</b>

### **Conservation Measures**

The MPAD proposes the following conservation measures to minimize adverse effects to the Monterey spineflower (SWCA 2018, 27):

1. To minimize impacts to Monterey spineflower and promote the continued existence of the species on the Airport property, the MPAD will implement a soil and seed bank conservation program that will include Monterey spineflower seed and top soil collection and distribution.
2. The MPAD will broadcast seeds and relocate soil seed bank in the temporarily impacted portions of the action area and/or in an established conservation area to conserve Monterey spineflower. Three sites within the conservation area on the east side of the Project site have been identified as potential Monterey spineflower seed and soil receptor sites.
3. Prior to the start of construction, a Service-approved biologist will collect seed from Project areas to be impacted that currently support Monterey spineflower and broadcast them in conservation areas. This species flowers from April through June; therefore, seed collection will begin in August and continue through September, or when seed production ceases.
4. The MPAD will collect and distribute soil from Project disturbance areas containing Monterey spineflower seed. The upper six inches of soil located within the vicinity of existing Monterey spineflower individuals will be collected and redistributed prior to grading activities. Soil collection will occur immediately following completion of seed collection and prior to the first rainfall. The collected soil will be immediately distributed in the receptor site(s). The collected seed will be broadcast over the relocated soil, and the receptor site will be lightly raked to cover the seed.

5. The MPAD will place fencing delineating Project work area boundaries to prevent unintended parking on or grading of suitable habitat. The fencing will remain in place and functional throughout the duration of the Project and no work activities will occur outside the delineated work area without the oversight of a monitoring biologist.
6. The Monterey spineflower seed receiver sites are located outside of Project disturbance areas in the proposed conservation areas, where compaction will be avoided. The largest of the three conservation areas may be subject to minor grading to remove invasive species. If minor grading is used to remove undesirable vegetation, the native soil will be preserved to ensure the activities do not result in excessive soil compaction.

The MPAD proposes the following conservation measures to minimize adverse effects to Yadon's piperia (SWCA 2018, pp. 22-29):

1. The Parking and Circulation area will be constructed on the existing asphalt to avoid impacts to Yadon's piperia plants that are located on the Airport/Fenton Keller property boundary.
2. Prior to ground disturbance, the MPAD will retain an environmental monitor trained by a Service-approved biologist to ensure compliance with the conservation measures. The monitor will be responsible for: (1) ensuring that procedures for verifying compliance with conservation measures are implemented; (2) establishing lines of communication and reporting methods; (3) conducting compliance reporting; (4) conducting construction crew training regarding environmentally sensitive areas and protected species; (5) maintaining authority to stop work; and (6) outlining actions to be taken in the event of non-compliance. Monitoring will occur during initial ground disturbing in potential Yadon's piperia habitat at a frequency and duration established by the MPAD after consultation with the Service.
3. Prior to the commencement of site grading, a Service-approved biologist or environmental monitor trained by an approved biologist will conduct an environmental awareness training for all construction personnel. The environmental awareness training will include discussions of the protected species that occur in and adjacent to the Project areas. Topics of discussion will include descriptions of the species' habitats, general provisions and protections afforded by the Act, measures implemented to protect listed species, review of the Project boundaries and special conditions, the monitor's role in Project activities, lines of communication, and procedures to be implemented in the event a special-status species is observed in the work area.
4. Prior to construction of the Parking and Circulation area, the construction plans will clearly show the placement of construction exclusion fencing along the toe of slope at the Airport/Fenton Keller property boundary and the southern border of the Fred Kane Drive parking area. Similarly, prior to construction of the drainage improvements, the construction plans will clearly show the placement of construction exclusion fence along



the western boundary of the drainage improvements. The intent of the fence is to prevent Yadon's piperia occurrences from accidental disturbance during construction. The fence will be maintained in place throughout the construction period.

5. The MPAD will retain a Service-approved biologist to design and implement a five-year Yadon's piperia seed and bulb collection and translocation program. The program will be developed within two years prior to construction of the new terminal and aircraft ramp, the parking and circulation improvements, and the south side drainage improvements. The Service will approve the plan prior to its implementation. The Yadon's piperia seed/bulb collection and translocation program will include the following:
  - a. Detailed methods and a schedule for the collection and distribution of Yadon's piperia seed and the translocation of Yadon's piperia bulbs that are in the disturbance area(s).
  - b. During the flowering/blooming period for Yadon's piperia (anticipated to be May through July) and in the year prior to Project construction, a qualified biologist will mark Yadon's piperia plants that will be impacted by Project construction with pin flags.
  - c. During the time that the marked Yadon's piperia plants are setting seed (anticipated to be August and September), the biologist will collect seed from the marked individuals. The collected seed will be redistributed in a predetermined seed and bulb receiver site that is located adjacent to but outside of the disturbance area. Due to mycorrhizal associations, the seed and bulb receiver site will be near existing Yadon's piperia individuals. Suitable habitat and existing occurrences are situated on a steep bank just south of Fred Kane Drive. The bank is protected from vehicular traffic by a large retaining wall. This area will serve as the Yadon's piperia seed and bulb receiver site.
    - i. Prior to distributing the collected seed in the receiver site, the receiver site will be cleared of nonnative vegetation.
    - ii. Once the seed receiver site is prepared, the biologist will hand broadcast the seed in the receiver site, gently rake the seed into the duff/soil surface and cover the seed with pine needle duff.
    - iii. The seed and bulb receiver site and nearby Yadon's piperia occurrences will be fenced during construction to exclude the area from accidental damages during construction activities.
  - d. Prior to construction and when plants are dormant (anticipated to be October through December) the biologist will excavate and relocate bulbs of the marked plants to the seed and bulb receiver site. The bulbs will be planted approximately six inches below the soil surface.
  - e. Following completion of the seed and bulb relocation efforts, the biologist will monitor the receiver site for four consecutive years. The goal of the monitoring will be to quantify and document the number of individuals that emerged in the receiver site, the presence of nonnative vegetation, and overall success of the translocation efforts.

- f. Nonnative vegetation removal will occur during the monitoring program. Nonnative vegetation removal will not utilize herbicides due to root to tuber/bulb transfer. The available Yadon's piperia receiver site is located outside of the project disturbance areas and will not be subject to any grading or soil compaction.

In addition to the above conservation measures, the MPAD proposes the following best management practices for herbicide use to avoid and minimize impacts to listed plants:

1. All herbicide spraying will be administered by hand, using a backpack, slip-on, truck, or trailer mounted spray unit according to herbicide label directions. Truck mounted sprayers may be necessary in certain instances because some of the treatment areas would only be accessible by truck and include dense cover of invasive species. Truck mounted sprayers will still be administered by hand through targeted use of a wand attached to the truck by a low-pressure hose.
2. Herbicide will only be applied by a certified applicator or by other trained personnel under the direct supervision of a certified applicator. All Occupational Safety and Health Administration, U.S. Environmental Protection Agency, State, and local agency rules and regulations regarding the application of herbicides will be followed.
3. Herbicide mixing locations and equipment cleaning will be restricted to sites where any spillage could be contained.
4. Glyphosate-based herbicides or fusilade (fluazifop-P-butyl) will be the only herbicides used. All personnel applying herbicides will receive training to use these herbicides. This training will include close review of the Material Safety Data Sheet, product labels for the herbicide, and field training regarding the safe storage, handling, mixing, and application of herbicides. Fusilade is a grass-specific herbicide that may be used to avoid damage/losses to native broadleaf plants in the treatment area.
5. Personnel will not apply herbicides when wind speeds exceed 10 miles-per-hour.
6. No herbicide applications will be conducted within known occupied habitat of Monterey spineflower and Yadon's piperia during the growing season.
7. All weed abatement done by staff or volunteers will be supervised by persons trained in the identification of federally listed species.
8. If any federally listed plant species are observed in work areas during weed abatement, the individuals will be flagged for avoidance. No herbicide applications will occur within 20 feet of the flagged occurrence(s). Manual weed abatement activities will be conducted in a manner that does not adversely affect the life cycle of the flagged individuals. Manual weed abatement activities within 10 feet of flagged individuals will be limited to hand pulling target weed species.

### **Compensatory Mitigation**

The MPAD proposes to mitigate anticipated unavoidable impacts to Monterey spineflower and Yadon's piperia through habitat management of conservation areas on the Airport property and transfer of listed plant materials salvaged during construction to these conservation areas. The conservation areas have been identified and approved by the MPAD. The Airport staff will determine specific locations to be used as mitigation sites within the conservation areas, based on the impact to be mitigated. The conservation areas support a variety of habitats that will accommodate mitigation activities for Monterey spineflower and Yadon's piperia.

The MPAD will restore habitat within the conservation areas by removing invasive species and introducing native plants in areas that support Monterey spineflower and Yadon's piperia. Monterey spineflower and Yadon's piperia plant materials salvaged during implementation of the action will also be introduced to suitable habitat within the conservation areas.

## **ANALYTICAL FRAMEWORK FOR THE JEOPARDY AND ADVERSE MODIFICATION DETERMINATIONS**

### **Jeopardy Determination**

Section 7(a)(2) of the Endangered Species Act requires that Federal agencies ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of listed species. "Jeopardize the continued existence of" means "to engage in an action that reasonably would be expected, directly or indirectly, to reduce appreciably the likelihood of both the survival and recovery of a listed species in the wild by reducing the reproduction, numbers, or distribution of that species" (50 CFR 402.02).

The jeopardy analysis in this biological opinion relies on four components: (1) the Status of the Species, which describes the rangewide condition of the Monterey spineflower and Yadon's piperia, the factors responsible for that condition, and their survival and recovery needs; (2) the Environmental Baseline, which analyzes the condition of the Monterey spineflower and Yadon's piperia in the action area, the factors responsible for that condition, and the relationship of the action area to the survival and recovery of these species; (3) the Effects of the Action, which determines the direct and indirect impacts of the proposed Federal action and the effects of any interrelated or interdependent activities on the Monterey spineflower and Yadon's piperia; and (4) the cumulative effects, which evaluates the effects of future, non-Federal activities, that are reasonably certain to occur in the action area on the Monterey spineflower and Yadon's piperia.

In accordance with policy and regulation, the jeopardy determination is made by evaluating the effects of the proposed Federal action in the context of the current status of the Monterey spineflower and Yadon's piperia, taking into account any cumulative effects, to determine if implementation of the proposed action is likely to reduce appreciably the likelihood of both the survival and recovery of the Monterey spineflower and Yadon's piperia in the wild by reducing the reproduction, numbers, and distribution of these species.

## STATUS OF THE SPECIES

**Monterey spineflower**

The Monterey spineflower was listed as a federally threatened variety of *Chorizanthe pungens* on February 4, 1994 (Service 1994), and 11,055 acres of critical habitat was designated on January 9, 2008 (Service 2008). Information contained in this account was obtained primarily from the Monterey spineflower 5-Year Review (Service 2009a, pp. 1-13).

Monterey spineflower is a prostrate annual plant in the buckwheat family (Polygonaceae). It has long, somewhat wiry branching stems supporting aggregates of small white to pinkish flowers. Seeds typically germinate after the onset of winter rains and plants can be found above ground as early as December (Fox et al. 2006). Flowering occurs from late March to June, depending on weather patterns, and seed is dispersed in mid-summer.

At the time of listing, Monterey spineflower in the Monterey Bay area was known from scattered populations along the immediate coast, in the Prunedale Hills at Manzanita Park, in the coastal and inland areas of former Fort Ord, and from historical collections described as east of Watsonville, and near Mission Soledad in the Salinas Valley (Reveal and Hardham 1989, CNDDDB 2019). Two historical collections were also made farther south, in southern Monterey County in 1935 and in northern San Luis Obispo County in 1842. Since its listing, additional populations of Monterey spineflower have been discovered in the Prunedale Hills of Monterey County and interior areas of Santa Cruz County.

Monterey spineflower is currently known to be extant in southern Santa Cruz and northern Monterey counties. The distribution of Monterey spineflower extends from Santa Cruz County south along the Monterey Bay to the Monterey Peninsula. Populations also remain extant inland in Monterey County in the Prunedale Hills and at former Fort Ord. There are 48 presumed extant occurrences of Monterey spineflower currently listed in California Natural Diversity Database (CNDDDB 2019).

As an annual species, Monterey spineflower responds strongly to annual precipitation patterns and amounts, resulting in large fluctuations in the population of plants visible above ground from year to year. Many populations support large numbers of individuals (thousands or tens of thousands of plants) scattered in openings among the dominant perennial vegetation.

Researchers recently investigated the phylogenetic relationships of various members of the genus *Chorizanthe*, subsection *Pungentes*, including Monterey spineflower (Brinegar 2006, Baron and Brinegar 2007, Brinegar and Baron 2008). Results from the first phase of the molecular study, using ribosomal DNA internal transcribed spacer (ITS) sequencing, indicate that Monterey spineflower and robust spineflower are more closely related to one another than to the other sub-specific taxa in the *C. pungens* and *C. robusta* complex. In a second phase of analysis, researchers sequenced chloroplast DNA to determine if it was possible to further differentiate Monterey spineflower from robust spineflower based on these genetic techniques. Results



indicated that: (1) there is a general agreement between the results of the ITS sequencing and the DNA phylogenies for the *C. pungens/C. robusta* complex, while results for the other *Pungentes* taxa are often inconsistent with their position in the ITS-based phylogeny; (2) there is a general biogeographical pattern to this phylogeny with regard to the *C. pungens/C. robusta* complex; and (3) there is genetic diversity between populations of Monterey spineflower. While the researchers suggest that a taxonomic revision of the *Pungentes* complex may be in order, no changes are being proposed at this time.

Monterey spineflower readily grows where suitable sandy substrates occur and, like other *Chorizanthe* species, where competition with other plant species is minimal (Harding Lawson Associates 2000, Reveal 2001). Studies of the soil requirements and shade tolerances of a related taxon, Ben Lomond spineflower (*Chorizanthe pungens* var. *hartwegiana*), concluded that this taxon is restricted to openings in sandy soils primarily due to its intolerance of shade produced by competing vegetation, rather than its restriction to the specific soil type (McGraw and Levin 1998).

Where Monterey spineflower occurs within native plant communities, along the coast as well as at more interior sites, it occupies microhabitats found between shrubs where there is little cover from other herbaceous species. In coastal dune scrub, shifts in habitat composition caused by patterns of dune mobilization that create openings suitable for Monterey spineflower are followed by stabilization and successional trends that result in increased vegetation cover over time (Barbour and Johnson 1988). Accordingly, over time there are shifts in the distribution and size of individual colonies of Monterey spineflower found in the gaps between shrub vegetation.

Human-caused disturbances, such as scraping of roads and firebreaks, can reduce the competition from other herbaceous species and consequently provide favorable conditions for Monterey spineflower, as long as competition from other plant species remains minimal. This has been observed at former Fort Ord, where Monterey spineflower occurs along the margins of dirt roads and trails and where it has colonized disturbances created by military training (Corps 1992, BLM 2003). However, such activities also promote the spread and establishment of nonnative species, can bury the seedbank of Monterey spineflower, and do not result in the cycling of nutrients and soil microbial changes that are associated with some large-scale natural disturbances, such as fires (Keeley and Keeley 1989, Stylinski and Allen 1999).

The primary threats to the Monterey spineflower identified at the time of listing were development, recreation, and encroachment of invasive nonnative species into its habitat. These threats continue to adversely impact occurrences of Monterey spineflower. However, some lands that support this taxon have been purchased by conservation-oriented organizations and are already preserved (e.g., Long Valley in the Prunedale Hills) or have the potential for long-term preservation (e.g., Caltrans lands). Within its range, numerous occurrences are on lands being restored or enhanced (e.g., State Beaches, Naval Post-Graduate School) or are planned for restoration and enhancement (e.g., former Fort Ord). A primary component of these programs is

the removal of invasive nonnative species that compete with Monterey spineflower, thus allowing Monterey spineflower to recolonize sites where nonnative species have been removed (Service 2009a).

### *Recovery of Monterey Spineflower*

The Seven Coastal Plants and the Myrtle's Silverspot Butterfly Recovery Plan (Service 1998a) outlines recovery criteria for Monterey spineflower. Monterey spineflower can be considered for delisting when the following criteria have been met:

1. The Fort Ord disposal and reuse process has led the management agencies to develop, fund, and implement permanent protection plans for the species' habitat including permanent ice-plant suppression programs; and
2. Beach-dune occurrences on State Park and private lands throughout its current range from Santa Cruz to the Monterey peninsula are covered under a permanent protection plan.

Plans to conserve roughly 60 percent of Fort Ord appear sufficient for recovery of the interior occurrence. A reassessment would be made should plans call for conservation of less habitat. Existing management along the coast at the State Parks units needs to be supplemented with protection and management on private lands (management to be determined after a thorough analysis of the beach populations). The recovery priority number for Monterey spineflower is 15. This number indicates that Monterey spineflower is a subspecies facing a low degree of threat and has a high potential for recovery. The long-term conservation of Monterey spineflower is dependent upon the protection of existing population sites and the maintenance of ecological functions, such as connectivity between populations within close geographic proximity to facilitate pollinator activity and seed dispersal.

### **Yadon's piperia**

Yadon's piperia was listed as a federally endangered species on August 12, 1998 (Service 1998b, 63 FR 43100), and 2,117 acres of critical habitat was designated for the species on November 23, 2007 (Service 2007, 72 FR 60410). Information contained in this account was obtained primarily from the Yadon's piperia 5-Year Review (Service 2009b, pp. 1-15).

Yadon's piperia is a slender perennial herb in the orchid family (Orchidaceae). As in other orchids, germination of Yadon's piperia seeds probably involves a symbiotic relationship with a fungus. Following germination, orchid seedlings typically grow below ground for one to several years, developing a structure known as a tuber before producing their first basal leaves. Plants may produce only vegetative growth for several years before producing flowers. In mature plants of Yadon's piperia, the basal leaves typically emerge sometime after fall or winter rains and wither by May or June, when the plant produces a single flowering stem. The blooming season of Yadon's piperia is fairly short; the first flowers are dependent on age and/or tuber size and

will open in late June with blooming completed by early August and fruits maturing from August to early October. The plant is dormant until the winter rains stimulate root and leaf bud development. Pollinators include nocturnal moths, bumblebees, and infrequently midges and mosquitoes (Doak and Graff 2001, pp. 8-25).

Yadon's piperia has been found in two primary habitat types: Monterey pine forest with an herbaceous, sparse understory, and ridges in maritime chaparral growing beneath dwarf Hooker's manzanita (*Arctostaphylos hookeri*) shrubs in shallow soils (Morgan and Ackerman 1990, p. 210; Allen 1996, p. 4; Doak and Graff 2001, p. 3). In Monterey pine forest, the species grows through pine needle duff among sparse herbaceous vegetation. Yadon's piperia grows in filtered sun on soils (sandy, podzolic, or decomposed granite when associated with Monterey pine and manzanitas) with a shallow clay hard pan that becomes very dry during the flowering season. Overall, this species favors a well-drained sandy soil substrate with podzolic conditions; areas that retain moisture during the rainy season but are not subject to inundation (Yadon, in litt. 1997, p. 2). In some Monterey pine forest locations, Yadon's piperia plants occur among dense stands of the nonnative annual grass *Briza maxima* (quaking grass) (Doak and Graff 2001, p. 3). In maritime chaparral habitat in northern Monterey County, plants grow on sandstone ridges where soils are shallow. They are commonly found under the edges of prostrate mats of Hooker's manzanita. Yadon's piperia can occur in some locations where disturbance has occurred in the past 10 to 15 years and that continue to be affected by limited recreation, development, and landscaping, such as abandoned dirt roads or cut slopes created by road construction (Allen 1996, p. 8). Like other orchid species, Yadon's piperia is not an early successional species but is able to colonize trails and road banks within maritime chaparral or Monterey pine forest once a decade or more has passed and if light and moisture regimes are favorable (Allen 1996, p. 9).

The center of distribution for Yadon's piperia is the Monterey peninsula where plants occur throughout the larger undeveloped tracts of Monterey pine forest. To the north, the range of Yadon's piperia extends to the Los Lomas area, near the border of Santa Cruz County (Monterey County 2005, p. C-17). Since preparation of the listing rule, Yadon's piperia has been found at one location south of the Monterey peninsula near Palo Colorado Canyon in maritime chaparral (Norman, in litt. 1995, pp. 1-3). Yadon's piperia has been found only 4 to 6 miles inland despite searches of lands farther east (Monterey County 2011, p. 3.3-30). The recovery plan lists five geographic areas important for recovery of the species: Monterey peninsula, the interior of Monterey peninsula, north County/Elkhorn/Prunedale, Point Lobos, and Palo Colorado Canyon (Service 2004, p. 51).

The Pebble Beach Company funded intensive surveys for Yadon's piperia, focusing on the Monterey Peninsula in 1995 and beyond the Peninsula in western Monterey County in 1996. Yadon's piperia plants have been counted at known sites throughout the range of this species since 1990 (Allen 1996, p. 11). During the 1995 surveys, the greatest concentrations of Yadon's piperia, approximately 57,000 plants or 67 percent of all known individuals, were found scattered throughout much of the remaining Monterey pine forest owned by the Pebble Beach Company and the Del Monte Forest Foundation on the Monterey peninsula (Jones and Stokes

1996, p. 22). Scattered large populations of Yadon's piperia occur along Stevenson Drive and Forest Lake Road surrounded by Spy Glass Hill and Poppy Hills Golf Courses and residential development on land owned by the Pebble Beach Company. Approximately 8,500 plants, about 15 percent of the total known individuals, occur at these sites (Jones and Stokes 1996, p. 25). Another 2,400 plants, 4 percent of all known, occurred on remnant patches of Monterey pine forest in parks and open space areas of Pacific Grove and Monterey (Jones and Stokes 1996, p. 25). During a 2004 follow-up survey in known occupied habitat on lands owned by Pebble Beach Company, 129,652 plants were identified, a 240 percent increase from the previous surveys (Service 2009b, p. 17; Zander Associates 2004, pp. 17-85).

East of the Monterey peninsula, individuals were identified on or near the Monterey Peninsula Airport, but the population appears to have been greatly reduced in certain areas of the airport. More than 2,350 plants were identified at the Naval Postgraduate School/Navy Golf Course in Monterey where they continue to be discovered and are expanding due to management efforts (Service 2009b, p. 17; Greening Associates 1999, pp. 1-46). At the former Fort Ord Base, Yadon's piperia was only known to occur in the extreme northern and southern boundaries until surveys conducted in 2009 identified at least 340 flowering Yadon's piperia in 118 locations on approximately 47 acres (Corps 2011, p. 11). The remaining populations occur on properties owned by the Pebble Beach Company, Del Monte Forest Foundation, U.S. Department of Defense, County of Monterey, City of Carmel, Monterey Peninsula Regional Park District, and an undetermined number of other private landowners (Jones and Stokes 1996, p. 24). Several of the privately-owned populations continue to be threatened by development. Although some of the populations are protected from development, threats to their long-term survival include nonnative species and recreational activities (Service 2009b, p. 5).

Inland to the north of the Monterey peninsula, about 17,976 Yadon's piperia plants or 21 percent of all known plants have been found on the chaparral-covered ridges north of Prunedale (Allen 1996, p. 6). South of the Peninsula, about 7,500 plants have been found on California Department of Parks and Recreation properties at Point Lobos Ranch (Big Sur Land Trust, in litt. 1997, p. 1) and in a smaller parcel that is in private ownership. Considering the current abundance of Yadon's piperia in the remaining large tracts of Monterey forest, this species probably occurred throughout the Peninsula when Monterey pine forests were much more extensive before urbanization.

South of Carmel Highlands, near Palo Colorado Canyon, 38 plants were observed in 1995. Plants were identified but not quantified on a return visit to the site in 2004. This site, in private ownership, was noted to be high quality chaparral with a unique assemblage of species (CNDDDB 2019).

At the time of listing in 1994, habitat fragmentation and development were main threats to Yadon's piperia. Much of the habitat fragmentation occurred in the past and the resulting effects are still a threat. The potential for further fragmentation of the remaining populations continues to be a threat to the species. Other threats to habitat for Yadon's piperia at the time of listing that continue include competition from nonnative plants, mowing of vacant properties, roadside



maintenance and a fire directive requiring mowing within 6 to 8 inches of the ground surface of habitat along roadways in the Pebble Beach area (Stromberg, in litt. 2002, p. 3), the potential loss of viable habitat due to changes in vegetative structure within sites following fire suppression (Graff 2006, pp. 8-11), and loss of plants from potential improvement projects at the Monterey Peninsula Airport. Large portions of the existing population at the airport could be lost from proposed future projects.

Since the time of listing, the threat of development and habitat fragmentation has been reduced somewhat. Some of the densest populations of Yadon's piperia on the Monterey peninsula have been set aside in designated open space areas by Pebble Beach Company, and will likely not be developed in the future. In addition, various groups have expressed interest in protecting additional populations of Yadon's piperia in the future. Also since the time of listing, extensive surveys have expanded the species' known range, discovered additional populations, and reported higher numbers of individuals. However, a number of factors have been shown to reduce the reproductive potential of the species. Recent research suggests that high rates of herbivory may significantly affect populations of Yadon's piperia over time by reducing the ability of individual plants to survive and reproduce (Doak and Graff 2001, pp. 14, 17; McGraw and Ecosystems West 2016, pp. 5-4 to 5-7). Research has also elucidated the importance of pollinators to achieving viable seed set, which is crucial for long-term persistence (Doak and Graff 2001, pp. 15-16). Therefore, although the range is greater and the number of populations and individuals now known is higher than at the time of listing, threats including herbivory, disease, and low rates of seed set may be adversely affecting the species and could diminish the likelihood of its persistence in the long-term.

The Pebble Beach Company has Monterey County's approval to develop portions of the Del Monte Forest. In 2012, both Monterey County and the California Coastal Commission approved a revised Del Monte Forest Plan that added over 105 acres of occupied Yadon's piperia habitat as designated preservation areas in the Del Monte Forest. Although the Service has recommended development of a habitat conservation plan pursuant to section 10 of the Act, Pebble Beach Company has proactively made substantial conservation efforts that would likely be similar to those needed to achieve permit issuance criteria under section 10.

The Pebble Beach Company entered into a Memorandum of Understanding with the Service on September 6, 2007 for the purpose of implementing a conservation strategy for Yadon's piperia on Company-owned lands (Service and PBC 2007, pp. 1-4). On May 31, 2019, the Service approved the Pebble Beach Company's request to amend the Memorandum of Understanding to eliminate 16 acres of a preservation area at the Old Capitol site designated for Yadon's piperia, given the significant addition of preservation acreage supporting the species in the Del Monte Forest and the relative scarcity of the species at the Old Capitol site (Service 2019). According to the census of Yadon's piperia at the Old Capitol site in 2005, approximately 20 percent of flowering piperia plants in the area were Yadon's piperia, the remainder being a more common and non-listed species, *P. elegans*. Pebble Beach Company dedicated twice the acreage (32 acres) in lieu of the 16 acres at Old Capitol site as part of the 105 acres added to preservation areas.

*Recovery of Yadon's piperia*

The current recovery objective for Yadon's piperia is reclassification to threatened status (Service 2004, p. 50). Further loss of existing plants and the species' habitat should be avoided, and threats to its survival should be eliminated. Recovery criteria will be revised and delisting criteria will be developed after management is underway and specific data become available relating to population size and viability, habitat requirements, and fragmentation effects.

Downlisting for Yadon's piperia can be considered when all of the following criteria have been achieved (Service 2004, pp. 51-52):

1. Secure and protect areas throughout the present range of Yadon's piperia that contain populations of sufficient size to ensure the long-term survival and recovery of the species.
2. Protected areas are adequately maintained, such that encroachment by nonnative plants, excessive herbivory from deer and rabbits, edge effects from road maintenance, fuel modification activities, or other threats do not directly or indirectly adversely affect Yadon's piperia and its habitat.
3. Results of monitoring activities have determined that the protected populations of Yadon's piperia are of adequate size to be self-sustaining and to ensure their long-term persistence. Because this species is a perennial that exhibits dormancy, spending an undetermined period underground between seed germination and emergence of first leaf aboveground, it is likely that a minimum of 10 to 15 years of monitoring will be needed in order to determine a population trend.

The recovery priority number for Yadon's piperia is 2C. This number indicates that the taxon is a species that faces a high degree of threat and has a high potential for recovery. The "C" indicates conflict with construction or other development projects or other forms of economic activity.

**ENVIRONMENTAL BASELINE**

The implementing regulations for section 7(a)(2) (50 CFR 402.02) define the environmental baseline as "the condition of the listed species or its designated critical habitat in the action area, without the consequences to the listed species or designated critical habitat caused by the proposed action. The environmental baseline includes the past and present impacts of all Federal, State, or private actions and other human activities in the action area, the anticipated impacts of all proposed Federal projects in the action area that have already undergone formal or early section 7 consultation, and the impact of State or private actions which are contemporaneous with the consultation in process. The consequences to listed species or designated critical habitat from ongoing agency activities or existing agency facilities that are not within the agency's discretion to modify are part of the environmental baseline."

**Action area**

Service regulations define the action area as “all areas affected directly or indirectly by the Federal action and not merely the immediate area involved in the action” (50 CFR 402.02). The action area includes approximately 99 acres situated on the north and south sides of the Airport property that contains the existing Airport Terminal, parking areas, GA facilities, portions of Taxiway A, the Navy Flying Club, the Northeast Tie Down areas, and undeveloped lands such as the soil deposition and staging areas located on the north side of the Airport.

**Habitat characteristics in the action area for Monterey spineflower**

The action area primarily consists of ruderal vegetation found in disturbed areas that have been significantly altered by construction, landscaping, or other types of land-clearing activities. In some areas, native plant species have started to recolonize the ruderal vegetation but do not provide sufficient cover to be considered a native plant community. Monterey spineflower is restricted to openings in sandy soils and open habitat conditions which occur in the action area. Part of this species’ success in persisting within the action area is due to its affinity towards open areas that are created by disturbance.

**Condition (Status) of Monterey spineflower in the action area**

Monterey spineflower is widespread on the Airport property. Based on the survey data, most individuals were observed along the North Access Road, GA Relocation and Soil Deposition areas on the north side of Airport. At the time of the 2017 surveys, the North Access Road and GA Relocation area supported approximately 141 Monterey spineflower individuals and the Soil Deposition area supported approximately 225 individuals, a total of 366 individuals across 4.58 acres of occupied habitat (SWCA 2018, p. 21). Monterey spineflower is an annual species and the number of individuals in a location can fluctuate from season to season. Habitat within the action area is fragmented due to the concrete taxiways that surround each infield area; therefore, Monterey spineflower populations within the infield areas are limited in their ability to disperse or expand from the infield areas.

**Recovery of Monterey spineflower in the action area**

The Seven Coastal Plants and the Myrtle’s Silverspot Butterfly Recovery Plan indicates that the Monterey spineflower can be considered for delisting when permanent protection plans are developed, funded, and implemented to protect the species’ habitat within the former Fort Ord, California State Parks, and private lands throughout its current range (Service 1998a, pp. 90-91). The action area is within two miles of Monterey spineflower critical habitat Unit 8 (Fort Ord Unit). Occurrences of Monterey spineflower within the action area are at interior locations, occupying several different microhabitats mostly towards the northeast and southeast portions of the action area.

The action area currently supports over 300 individual Monterey spineflowers and at one time, habitat supporting these populations was likely continuous with habitat on former Fort Ord, therefore the action area is valuable towards the recovery of the species. Although the Airport has continued to impact habitat as a result of airport improvement projects, the MPAD has worked to mitigate impacts to Monterey spineflower by providing management and protection of alternate habitat areas within the airport and creating a link between areas.

### **Habitat Characteristics in the action area for Yadon's piperia**

Numerous occurrences of Yadon's piperia are found within the sparse understory of the Monterey pine (*Pinus radiata*) forest in the action area. The Monterey pine forest is largely located at the southern Airport property boundary. It includes coast live oak (*Quercus agrifolia*) and a few landscape trees as subdominants in the tree canopy, creating a *Pinus radiata/Quercus agrifolia* association in parts of the Airport. The shrub layer varies from landscape and ruderal species near the terminal and existing Airport parking to nonnative grassland adjacent to State Route 68.

### **Condition (Status) of Yadon's piperia in the action area**

Yadon's piperia has numerous occurrences on the southern portion of the Airport and sparse occurrences in the northern portion of the Airport. Based on the collective survey data from 2017, 53 individuals occurred in the Terminal Area, 3 individuals occurred in the Parking and Circulation area, and 1 individual occurred in the Drainage Improvements area (SWCA 18, pp. 21-22). Approximately 1,215 additional individuals were known to have occurred on the Airport property outside of the action area. The existing habitat for Yadon's piperia is currently fragmented due to the Parking and Circulation area and the Southside Terminal.

### **Recovery of Yadon's piperia in the action area**

The Recovery Plan identifies five areas where self-sustaining populations of Yadon's piperia should be maintained to allow downlisting of the species - the Monterey Peninsula (Area 1), the area interior of the Monterey Peninsula (Area 2), northern Monterey County-Prunedale Elkhorn (Area 3), the area east of Point Lobos State Reserve-Point Lobos Ranch (Area 4), and Palo Colorado Canyon (Area 5) (Service 2004, p. 51). The Monterey Regional Airport is contained within Area 2. The action area represents a very small portion of suitable and occupied habitat in the interior of the Monterey Peninsula (Area 2). The populations of Yadon's piperia at the Monterey airport have historically been negligible as compared to the populations at the Old Capitol Site and the Naval Post-graduate School, which are also found in Area 2 (Service 2009b, p. 18).

Critical habitat Unit 4 (Aguajito Unit) is located approximately 0.83 miles to the south of the action area (Service 2007). The action area could potentially contribute to the recovery of Yadon's piperia regionally and overall upon adequate maintenance of all remaining populations



within the Airport, such that encroachment by nonnative plants, edge effects from road maintenance, fuel modification activities, or other threats do not continue to negatively impact Yadon's piperia and its habitat.

### **Previous Consultations in the Action Area**

On May 13, 2010, the Service issued the Biological Opinion for the Monterey Airport Runway Safety Area Project (2010-F-0272) (Service 2010) for the Monterey spineflower and Yadon's piperia. On June 15, 2018, the Service issued the Biological Opinion for the Monterey Regional Airport Infield and Taxiway Improvements Project (2018-F-0193) (Service 2018) for the Monterey spineflower. In both biological opinions, the Service concluded that the proposed actions are not likely to jeopardize the continued existence of the species.

### **EFFECTS OF THE ACTION**

The implementing regulations for section 7(a)(2) define effects of the action as "all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action" (50 CFR 402.02).

### **Effects of the Proposed Action on Monterey spineflower**

The proposed action is anticipated to remove Monterey spineflower occurrences and their seed bank and convert occupied Monterey spineflower habitat to developed lands. Monterey spineflower is widespread on the Airport property and its population on the Airport fluctuates annually, making it difficult to predict the potential impacts to the species that could occur as a result of the proposed action. Surveys in 2017 found 366 individuals across 4.58 acres within the North Access Road, GA Relocation and the Soil Deposition areas. Based on the Project design, we expect that all Monterey spineflower individuals occurring in these Project areas would be adversely affected due to the removal of individuals, loss of soil seed bank from removing top soil, and the conversion of available habitat to developed areas. All individual plants in this area would be subject to damage or mortality as a result of removal or cutting of plants and crushing or inadvertent trampling by heavy equipment or personnel. The proposed action could interfere with pollination elsewhere within the action area through loss and fragmentation of habitat or reduction of pollinating insects. Direct impacts to Monterey spineflower individuals occurring adjacent to the action area would be avoided through fencing or flagging.

The MPAD proposes to compensate for unavoidable impacts to the Monterey spineflower by conducting habitat restoration activities in the proposed conservation areas. Restoration activities would include collecting Monterey spineflower seed and soil seed bank materials and redistributing the materials in the appropriate habitat within conservation areas. The MPAD would conduct invasive species removal, native species planting, and other habitat restoration

activities in areas containing Monterey spineflower. Manual and chemical methods such as herbicide treatment to remove invasive and nonnative plant species could injure or kill Monterey spineflowers if they co-occur with the nonnative species. However, the MPAD has proposed best management practices for herbicide use in order to reduce the likelihood of harm to Monterey spineflowers. Restoration activities also could result in temporary adverse effects from inadvertent trampling, minor soil disturbance, or other mechanical disturbance. Nonetheless, MPAD's proposed restoration activities to benefit Monterey spineflower in the conservation areas should partially compensate for the Project's adverse effects.

### **Effects of the Proposed Action on Yadon's Piperia**

The proposed action is anticipated to remove Yadon's piperia occurrences and their seed bank and convert occupied Yadon's piperia habitat to developed lands. Yadon's piperia has previously been observed in the Terminal, Parking and Circulation, and Drainage Improvement areas. We cannot quantify the precise number of Yadon's piperia plants that would be effected because tubers can remain dormant for several years before expressing leaves aboveground, and not all tubers produce aboveground leaves every year. According to the most recent surveys conducted in 2017 across 0.17 occupied acres, 57 individuals occurred in the Terminal Area, three individuals occurred in the Parking and Circulation area, and one individual occurred in the Drainage Improvements area, a total of 61 individuals (SWCA 2018, pp. 21-22). We expect that construction activities would lead to the removal of all individuals and occupied habitat in the specified areas and could interfere with pollination elsewhere within the action area through loss and fragmentation of habitat or reduction of pollinating insects.

Effects to Yadon's piperia could also result from habitat restoration activities that would be conducted in the proposed conservation areas. The proposed action would include collecting Yadon's piperia seed and bulb materials and redistributing the materials in suitable habitat within the conservation areas. Piperia tubers could be damaged or destroyed during collection at impact sites or transfer to receiver sites, or fail to grow if habitat conditions at receiver sites were not favorable to the species' establishment. Manual and chemical methods such as herbicide treatment to remove invasive and nonnative plant species could injure or kill Yadon's piperia individuals if they co-occur with the nonnative species. Restoration activities could also result in temporary adverse effects from inadvertent trampling, minor soil disturbance, or other mechanical disturbance. Nonetheless, MPAD's proposed restoration activities should partially compensate for the Project's adverse effects to Yadon's piperia.

### **Effects of Herbicide Use on Monterey spineflower and Yadon's piperia**

The proposed project includes the use of herbicides with the active ingredient glyphosate and/or fluazifop-P-butyl. Glyphosate is a non-selective systemic herbicide that kills or suppresses many grasses, forbs, vines, shrubs, and trees (Tu et al. 2001). If glyphosate is applied to Monterey spineflower or Yadon's piperia, these species could be killed or suppressed. MPAD's best management practices for herbicide use will reduce the likelihood of exposure of these plants to glyphosate.

Fusilade (Fluazifop-P-butyl) is an effective herbicide for the control of many annual and perennial grass weeds (i.e., Poaceae monocots); however, it is much less toxic to dicots, such as Monterey spineflower, and non-Poaceae monocots, such as Yadon's piperia. Consequently, applications of fusilade do not appear to pose a risk to terrestrial dicots or non-Poaceae monocots (Durkin 2014, p. xvii).

Airborne drift of chemicals due to wind is the scenario of greatest concern for non-target sensitive species. The likelihood of overspray or other accidental exposure to both listed plants would be very low and further minimized through implementation of the MPAD's proposed best management practices for herbicide use.

### **Effects on recovery of Monterey spineflower**

The action area is not specifically cited in the recovery plan (Service 1998a) as serving a role in the recovery of the Monterey spineflower. The proposed action would have temporary and permanent impacts to existing habitat for Monterey spineflower and would kill all individuals occurring in construction areas. However, the proposed Project would not appreciably reduce the chances of recovery for the Monterey spineflower, as the amount of occupied habitat being permanently removed would be small relative to the size of the species' rangewide distribution.

The Project would implement conservation actions that would offset some loss of individuals and habitat. The soil and seed bank conservation program may, depending on successful germination, maintain genetic diversity of Monterey spineflower and establish a population within the conservation areas. The past successes of Monterey spineflower germination in the replacement seed receiver sites indicate that the site is suitable to support the species. A Service-approved biologist will continue seed collection and distribution in the area to help promote the establishment of a self-sustaining population in the area. The seed receiver site is in conservation area 3, which is subject to monthly weed control efforts (SWCA 2019, p. 4). The on-going seed distribution and weed control will facilitate the species continued existence in the action area.

### **Effects on recovery of Yadon's piperia**

The action area is within Yadon's piperia Recovery Area 2 (Service 2009, p. 17). While the proposed action would have temporary and permanent impacts to existing habitat for Yadon's piperia and would kill all individuals occurring in construction areas, the removal of habitat from this Project represents a small proportion of all the occupied Yadon's piperia habitat in Recovery Area 2. Therefore, we do not expect these effects to be of a magnitude that would prevent conservation and management of habitat or connectivity between occupied habitats as needed to promote recovery of the species. Furthermore, the MPAD's proposed compensatory mitigation actions, including salvaging and translocating tubers of plants to protected areas undergoing habitat restoration, would offset some loss of individuals and habitat and should facilitate the species continued existence within the action area.

## CUMULATIVE EFFECTS

Cumulative effects include the effects of future State, tribal, local or private actions that are reasonably certain to occur in the action area considered in this biological opinion. We do not consider future Federal actions that are unrelated to the proposed action in this section because they require separate consultation pursuant to section 7 of the Act.

The MPAD recently approved the adoption of an Airport Master Plan (AMP) that includes several potential projects that could affect Monterey spineflower and Yadon's piperia. However, all the reasonably foreseeable projects planned to be implemented within the next five years would be reviewed by the FAA. As such, any reasonably foreseeable project that the MPAD proposes would be subject to FAA funding and/or authorization. If the MPAD embarks on developing AMP projects that have been identified to affect Monterey spineflower and/or Yadon's piperia, the FAA would initiate additional consultation(s) with the Service for the specific action. Due to the FAA involvement on any reasonably foreseeable action that may occur in the action area, no future state or private activities not involving federal activities are anticipated in the action area. Therefore, no cumulative effects on Monterey spineflower and Yadon's piperia in the action area are anticipated.

## CONCLUSION

The regulatory definition of "to jeopardize the continued existence of the species" focuses on assessing the effects of the proposed action on the reproduction, numbers, and distribution, and their effect on the survival and recovery of the species being considered in the biological opinion. For that reason, we have used those aspects of the statuses of the Monterey spineflower and Yadon's piperia as the basis to assess the overall effect of the proposed action on the species.

### **Monterey spineflower**

#### Reproduction

Construction of the project would permanently remove areas of occupied habitat for the Monterey spineflower and would make additional areas temporarily unavailable to the species. These areas would otherwise be available for the species to carry out its life cycle, which includes reproduction. The reproductive capacity of Monterey spineflower could be adversely affected by complete loss or temporary degradation of habitat and/or loss of individuals, removal of the seed bank, increased erosion, and colonization of nonnative grasses or other normative plant species. The MPAD has proposed measures to avoid and/or minimize adverse effects to listed plants such as the implementation of a soil and seed bank conservation program that will include Monterey spineflower seed and top soil collection and distribution. Monitoring, fencing and avoidance of populations, controlling invasive weeds and erosion, and restoring habitat, would further reduce effects on reproduction in the action area.



Overall, the effects on the reproductive capacity of the Monterey spineflower rangewide would be negligible. Far more plants will remain viable outside of the project boundaries in other areas of the Monterey Regional Airport, as well as other locations within the Monterey spineflower's range. While the proposed action would reduce the availability of habitat within the Project footprint and could interfere with pollination elsewhere within the action area, we do not expect these effects on reproduction to be of a magnitude that would reduce appreciably the likelihood of both the survival and recovery of the Monterey spineflower.

### Numbers

Construction and maintenance of the Project would permanently remove 4.58 acres of habitat and would make additional areas temporarily unavailable to the species. Where these effects occur in currently occupied habitat, all Monterey spineflower plants would be destroyed in construction areas causing a small reduction in the overall number of plants. However, the areal extent of these effects would be relatively small in comparison with the amount of occupied habitat for the species and its overall population.

Furthermore, we expect that those habitat areas that are temporarily impacted can be effectively restored, such that they will again become available to the species and its numbers will recover. The MPAD also proposes to transfer impacted soils and their associated Monterey spineflower seed bank to the proposed conservation areas. This may augment Monterey spineflower numbers in these areas and further reduce negative effects of the Project on the species' numbers. Even though the proposed action would reduce the number of Monterey spineflowers within the action area, we do not expect these effects to be of a magnitude that would reduce appreciably the likelihood of both the survival and recovery of the species.

### Distribution

Construction and maintenance of the Project would permanently remove approximately 4.58 acres of habitat. Although a small amount of occupied habitat would be lost, the distribution of the Monterey spineflower would not be changed by the proposed action. The affected habitat in the action area is currently fragmented due to being surrounded by concrete taxiways and the North Access Road. The proposed action would not reduce the rangewide distribution of Monterey spineflower and we do not expect these effects to be of a magnitude that would reduce appreciably the likelihood of both the survival and recovery of the species.

### Recovery

Although the Project would have temporary and permanent effects on habitat for Monterey spineflower and could kill individuals of the species, we do not expect these effects to preclude recovery. In addition, the anticipated impacts to Monterey spineflower should be mitigated to some extent via the proposed management of conservation areas on the Airport property for the species. Monterey spineflower plant materials salvaged during implementation of the action will

be introduced in the selected conservation areas. We therefore conclude that the proposed action would not preclude our efforts to recover of the species.

### Conclusion for Monterey spineflower

After reviewing the current status of the Monterey spineflower, the environmental baseline for the action area, the effects of the MPAD's proposed Monterey Regional Airport Safety Enhancement Project and the cumulative effects, it is the Service's biological opinion that the Project, as proposed, is not likely to jeopardize the continued existence of the Monterey spineflower. The Service has come to this conclusion due to the following reasons:

1. The effects on reproduction would be negligible, considering the small area of occupied habitat and number of plants that would be lost relative to the overall range of, and area of habitat occupied by, the Monterey spineflower. We conclude that the minor effects of the Project would not appreciably diminish reproduction of the Monterey spineflower either locally or rangewide;
2. The effects on numbers would be minor relative to the overall population of the Monterey spineflower. The loss of a relatively very small number of individuals would not be a substantial reduction in numbers either locally or rangewide;
3. Although a small amount of occupied habitat would be lost, the distribution of the Monterey spineflower would not be changed by the proposed action. Monterey spineflowers would still exist adjacent to the Project site at the available Monterey spineflower seed receiver sites on the north-east side of the action area. These seed receiver sites are located outside of the Project disturbance areas, in designated conservation areas, thus retaining the species in its current distribution; and
4. The proposed action would not interfere with or preclude ongoing recovery efforts for the Monterey spineflower.

### **Yadon's piperia**

#### Reproduction

Construction of the project would permanently remove areas of occupied habitat for Yadon's piperia and would make additional areas temporarily unavailable to the species. These areas would otherwise be available for the species to carry out its life cycle, which includes reproduction. The reproductive capacity of Yadon's piperia could be adversely affected by complete loss or temporary degradation of habitat and/or loss of individuals, removal of the seed bank, increased erosion, and colonization of nonnative grasses or other normative plant species. However, the areal extent of these effects would be relatively small in comparison with the amount of occupied habitat for the species. Even though the proposed action would reduce the availability of habitat within the Project footprint and could interfere with pollination elsewhere

within the action area, we do not expect these effects on reproduction to be of a magnitude that would reduce appreciably the likelihood of both the survival and recovery of Yadon's piperia.

### Numbers

Construction of the project would permanently remove all Yadon's piperia that occur in construction areas and 0.17 acres of occupied habitat. Even though the proposed action would reduce the number of individuals of Yadon's piperia within the action area, we do not expect these effects to be of a magnitude that would reduce appreciably the likelihood of both the survival and recovery of the species. The area of occupied habitat lost is negligible compared to the amount of occupied habitat rangewide, thus we expect the relative reduction in numbers of Yadon's piperia resulting from loss of habitat during the Project to also be negligible.

Furthermore, we expect that those habitat areas that are temporarily impacted can be effectively restored, such that they will again become available to the species and its numbers will recover. The MPAD also proposes to transfer impacted soils and the associated Yadon's piperia tubers and seed to the proposed conservation areas. This may augment Yadon's piperia numbers in these areas and further reduce negative effects of the Project on the species' numbers. Even though the proposed action would reduce the number of Yadon's piperia within the action area, we do not expect these effects to be of a magnitude that would reduce appreciably the likelihood of both the survival and recovery of the species.

### Distribution

Construction and maintenance of the Project would permanently remove 0.17 acre of habitat for Yadon's piperia. Although a small amount of occupied habitat would be lost, the proposed action would not reduce the rangewide distribution of Yadon's piperia, and we do not expect these effects to be of a magnitude that would reduce appreciably the likelihood of both the survival and recovery of the species.

### Recovery

Although the Project would have temporary and permanent effects on habitat for Yadon's piperia and could kill individuals of the species, we do not expect these effects to preclude recovery. In addition, the anticipated impacts to Yadon's piperia should be mitigated to some extent via the proposed and management of conservation areas on the Airport property for the species. Yadon's piperia plant materials salvaged during implementation of the action will be introduced in the selected conservation areas. We therefore conclude that the proposed action would not preclude our efforts to recover the species.

### Conclusion for Yadon's piperia

After reviewing the current status of Yadon's piperia, the environmental baseline for the action area, the effects of the MPAD's proposed Monterey Regional Airport Safety Enhancement

Project and the cumulative effects, it is the Service's biological opinion that the project, as proposed, is not likely to jeopardize the continued existence of Yadon's piperia. The Service has come to this conclusion due to the following reasons:

1. The effects on reproduction would be negligible, considering the small area of occupied habitat and number of plants that would be lost relative to the overall range of, and area of habitat occupied by Yadon's piperia. We conclude that the minor effects of the Project would not appreciably diminish reproduction of Yadon's piperia either locally or rangewide;
2. The effects on numbers would be minor relative to the overall population of the Yadon's piperia. The loss of a relatively very small number of individuals would not be a substantial reduction in numbers either locally or rangewide;
3. Although a small amount of occupied habitat would be lost, the distribution of Yadon's piperia would not be changed by the proposed action. Yadon's piperia would still exist adjacent to the Parking and Circulation Project area at the available seed receiver site along with Yadon's piperia plants known to occur on the Airport property beyond the action area.
4. The proposed action would not interfere with or preclude ongoing recovery efforts for the Yadon's piperia.

#### INCIDENTAL TAKE STATEMENT

Section 9 of the Act and Federal regulation pursuant to section 4(d) of the Act prohibit the take of endangered and threatened wildlife species, respectively, without special exemption. Take is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or to attempt to engage in any such conduct. Harm is further defined by the Service to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Incidental take is defined as take that is incidental to, and not the purpose of, the carrying out of an otherwise lawful activity. Under the terms of section 7(b)(4) and section 7(o)(2), taking that is incidental to and not the purpose of the agency action is not considered to be prohibited taking under the Act provided that such taking is in compliance with the terms and conditions of this incidental take statement.

In June 2015, the Service finalized new regulations implementing the incidental take provisions of section 7(a)(2) of the Act. The new regulations also clarify the standard regarding when the Service formulates an Incidental Take Statement [50 CFR 402.14(g)(7)], from "...if such take may occur" to "...if such take is reasonably certain to occur." This is not a new standard, but merely a clarification and codification of the applicable standard that the Service has been using and is consistent with case law. The standard does not require a guarantee that take will result; only that the Service establishes a rational basis for a finding of take. The Service continues to



rely on the best available scientific and commercial data, as well as professional judgment, in reaching these determinations and resolving uncertainties or information gaps.

Sections 7(b)(4) and 7(o)(2) of the Act generally do not apply to listed plant species; however, limited protection of listed plants is provided at section 9(a)(2) to the extent that the Act prohibits the removal and reduction to possession of federally listed plants from areas under Federal jurisdiction, the malicious damage or destruction of such plants on areas under federal jurisdiction, and the destruction of listed plants on non-federal areas in violation of State law or regulation or in the course of a violation of a State criminal trespass law.

### REPORTING REQUIREMENTS

Pursuant to 50 CFR 402.14(i)(3), the FAA and MPAD must report the progress of the action and its impact on the species to Service's Ventura Fish and Wildlife Office (2493 Portola Road, Suite B, Ventura, California 93003) by the end of each calendar year in which project activities are implemented. The report must describe all activities that were conducted under this biological opinion, including implementation of conservation measures and other activities that were described in the proposed action. The Service recognizes that parties contracted by the FAA may author the report described above. However, the FAA must review the report to ensure compliance with the requirements of this biological opinion prior to submitting the report to the Service.

### CONSERVATION RECOMMENDATIONS

Section 7(a)(1) of the Act directs Federal agencies to use their authorities to further the purposes of the Act by carrying out conservation programs for the benefit of endangered and threatened species. Conservation recommendations are discretionary agency activities to minimize or avoid adverse effects of a proposed action on listed species or critical habitat, to help implement recovery plans, or to develop information.

We recommend that the FAA and MPAD work with the Monterey Regional Airport to develop an informational brochure and brief training for maintenance contractors who conduct weed control, landscaping, and other activities on the site that explains the relevant conservation measures being implemented to prevent adverse effects to Monterey spineflower and Yadon's piperia from application of herbicides, handling of invasive plants, intrusion of workers into adjacent occupied habitat, etc.

The Service requests notification of the implementation of any conservation recommendations so we may be kept informed of actions taken to minimize or avoid adverse effects or to benefit listed species and their habitats.

## REINITIATION NOTICE

This concludes formal consultation on the action(s) outlined in the request for formal consultation. As provided in 50 CFR 402.16, reinitiation of formal consultation is required where discretionary Federal agency involvement or control over the action has been retained (or is authorized by law) and if: (1) new information reveals effects of the agency action that may affect listed species or critical habitat in a manner or to an extent not considered in this opinion; (2) the agency action is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered in this opinion; or (3) a new species is listed or critical habitat designated that may be affected by the action. If you have any questions about this biological opinion, please contact Amy Duggal of my staff at (805) 644-3346, or by electronic mail at [amrita\\_duggal@fws.gov](mailto:amrita_duggal@fws.gov).

Sincerely,



Acting  
for Stephen P. Henry  
Field Supervisor

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Appendix D

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**LAND ASSURANCE LETTER AND  
POLICY CONSISTENCY ANALYSIS**





February 9, 2018

Federal Aviation Administration  
San Francisco Airports District Office  
Ms. Laurie Suttmeier, Assistant Manager  
1000 Marina Blvd., Suite 220  
Brisbane, CA 94005-1835

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Executive Director  
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District Counsel

RE: LAND USE ASSURANCE LETTER – MONTEREY REGIONAL AIRPORT

Dear Ms. Suttmeier,

The Monterey Peninsula Airport District (MPAD) makes the following statement of compatible land use assurance as required by 49 United States Code Section 47107(a)(10).

The Monterey Peninsula Airport District provides assurance that appropriate action, including the adoption of zoning laws, has been or will be taken to the extent reasonable to restrict the use of land next to or near the airport to uses that are compatible with normal airport operations, pursuant to 49 United States Code Section 47107(a)(10).

In addition, the MPAD continues to support and encourage compatible land uses surrounding the airport boundaries through regular communication with the Monterey County Airport Land Use Commission.

Sincerely,

Michael La Pier, AAE  
Executive Director

cc: Grant File

<b>TABLE D1 City of Del Rey Oaks General Plan Goals and Policies Consistency Analysis Proposed Action and No Action Alternatives</b>		
	<b>Proposed Action Alternative</b>	<b>No Action Alternative</b>
<b>Land Use Element Goals and Policies</b>		
Goal 10. Participate with the Airport District to minimize impacts of airport development and its effect on the City of Del Rey Oaks.	<b>Consistent.</b> The Airport has had ongoing communication with the City of Del Rey Oaks and will continue to coordinate with the city throughout this EA process.	<b>Consistent.</b> Under this alternative, no additional airport development would occur.
Goal 12. Conserve and improve the living environment of existing Del Rey Oaks neighborhoods.	<b>Consistent.</b> The Proposed Action incorporates vegetated open space buffers between proposed airport development and adjacent Del Rey Oaks residents. In addition, this EA identifies measures to avoid and minimize construction dust and noise impacts.	<b>Consistent.</b> Under this alternative, no additional airport development would occur.
Policy L-5. The Airport shall not expand its present aviation operation. If expansion is necessary to accommodate projected passenger demand, it should be moved away from populated areas prior to further improvement and capital investments.	<b>Not Applicable.</b> This policy is not consistent with the federal grant assurances under which the Airport must operate. Grant Assurance No. 22, Economic Nondiscrimination, states, in part, that the Airport must "make the airport available for public use on reasonable terms and without unjust discrimination to all types, kinds and classes of aeronautical activities..."	<b>Not Applicable.</b> The consistency analysis for the Proposed Action is also applicable to this alternative.
<b>Circulation Goals and Policies</b>		
Policy C-17. The City will not support the potential north side access from Highway 218 and Del Rey Gardens Drive or any airport access road through the City of Del Rey Oaks.	<b>Consistent.</b> No change to the Airport's north side access would occur.	<b>Consistent.</b> No change to the Airport's north side access would occur.
<b>Open Space/Conservation Goals and Policies</b>		
Policy C/OS-1. The City will encourage protection of scenic resources by: a. Locate structures away from ridgelines, steep slopes, or in other highly visible locations unless site review and design makes it desirable; b. Utilize natural landforms and vegetation for screening structures, access roads, building foundations, and cut and fill slopes;	<b>Consistent.</b> Trees and topography located along the north airport property line prevent views past the southern edge of an existing berm located 55 to 160 feet from the northern property line.	<b>Consistent.</b> Under this alternative, no additional airport development would occur.

**TABLE D1 (Continued)**

**City of Del Rey Oaks General Plan Goals and Policies Consistency Analysis  
Proposed Action and No Action Alternatives**

	<b>Proposed Action Alternative</b>	<b>No Action Alternative</b>
<b>Open Space/Conservation Goals and Policies (continued)</b>		
Policy C/OS-5b. The City shall use open space as a buffer between various types of land use.	<b>Consistent.</b> The Proposed Action incorporates a 100-foot-wide vegetated open space buffer (approximately 10 acres), as well as an additional biological conservation area, between proposed airport development and adjacent Del Rey Oaks residents. Trees and topography located along the north airport property line prevent views past the southern edge of an existing berm located 55 to 160 feet from the northern property line.	<b>Consistent.</b> Under this alternative, no additional airport development would occur.
<b>Noise Goals and Policies</b>		
Goal 1. Protect citizens from exposure to excessive levels of noise.	<b>Consistent.</b> The Proposed Action does not increase the existing and future 65 Community Noise Equivalent Level (CNEL) contours. In addition, avoidance and minimization measures are identified for any construction occurring during the nighttime hours.	<b>Consistent.</b> Under this alternative, no additional airport development would occur.
Goal 2. Encourage a reduction in aircraft noise impact on the City of Del Rey Oaks to levels specified by State noise standards (65 dB) and require adequate soundproofing in new constructions.	<b>Consistent.</b> The Proposed Action does not increase the existing and future 65 CNEL contours.	<b>Consistent.</b> Under this alternative, no additional airport development would occur.
Policy N-6. The City will work with the Monterey Peninsula Airport District to minimize the noise impacts of the proposed increase in airport operations and changes in different types of aircraft will not be supported by the City.	<b>Consistent.</b> The Proposed Action would not expand the existing capacity of the airfield or number of passenger terminal aircraft loading gates and the provision of additional hangars is in keeping with GA trends towards more sophisticated (and quieter) aircraft. The Proposed Action does not increase the existing and future 65 CNEL contours.	<b>Consistent.</b> Under this alternative, no additional airport development would occur.

Source: City of Del Rey Oaks 1997

**TABLE D2**

**City of Monterey General Plan Goals and Policies Consistency Analysis  
Proposed Action and No Action Alternatives**

	<b>Proposed Action Alternative</b>	<b>No Action Alternative</b>
<b>Urban Design Element Goals and Policies</b>		
<p>Goal c. Respect and retain the wooded canyons as distinctive features, as the natural separation of neighborhoods, as locations for scenic roadways, and as recreational opportunities.</p> <ul style="list-style-type: none"> <li>– Policy c.1. Maintain the canyons and their native vegetation through their lengths.</li> </ul>	<p><b>Consistent.</b> The Proposed Action is required by the City of Monterey to have landscaping plans incorporating native vegetation to the extent feasible within or adjacent to the 100-foot setback from Highway 68.</p>	<p><b>Consistent.</b> No change to the Highway 68 corridor would occur with this alternative.</p>
<p>Goal g. Landscape elements should be consistent and compatible within each area.</p> <ul style="list-style-type: none"> <li>– Policy g.2. Favor native species.</li> <li>– Policy g.5. Protect existing cypress, Monterey pine, and coast live oak trees in urban and historic contexts, replant when removal is necessary, and retain the health of the stands.</li> <li>– Policy g.7. Use trees to screen parking where appropriate.</li> <li>– Policy g.8. Encourage planting of trees on public and private land throughout the City of Monterey.</li> </ul>	<p><b>Consistent.</b> The Proposed Action is required by the City of Monterey to have landscaping plans incorporating native vegetation to the extent feasible within or adjacent to the 100-foot setback from Highway 68. The landscaping plans shall include native species, protect existing cypress, Monterey pine and coast live oak trees to the extent possible, and use trees to screen parking, where appropriate.</p>	<p><b>Consistent.</b> No change to the Highway 68 corridor would occur with this alternative.</p>
<p>Monterey-Salinas Highway</p> <ul style="list-style-type: none"> <li>– Policy h.9. Landscape buffers should be provided at least 100 feet in width from the ultimate planned right-of-way of State-designated scenic highways.</li> <li>– Policy h.19. Reverse the visual degradation of scenic forests.</li> <li>– Policy h.20. Avoid further illumination along Ryan Ranch and Garden Road Business Park areas.</li> <li>– Policy h.21. Screen buildings close to the Highway with native vegetation, such as Coast Live Oak.</li> <li>– Policy h.22. Maintain the scenic corridor.</li> </ul>	<p><b>Consistent.</b> The Proposed Action is required by the City of Monterey to have landscaping plans incorporating native vegetation to the extent feasible within or adjacent to the 100-foot setback from Highway 68. The landscaping plans shall include native species, protect existing cypress, Monterey pine and coast live oak trees to the extent possible, and use trees to screen parking, where appropriate.</p>	<p><b>Consistent.</b> No change to the Highway 68 corridor would occur with this alternative.</p>
<b>Circulation Element Goals and Policies</b>		
<p>Policy b.5 Do not support non-aviation uses within the Monterey Peninsula Airport District that create unnecessary traffic impacts in adjacent residential neighborhoods.</p>	<p><b>Not Applicable.</b> The Proposed Action does not include non-aviation uses.</p>	<p><b>Not Applicable.</b> The No Action alternative does not include non-aviation uses.</p>
<p>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.</p>	<p><b>Inconsistent. The Proposed Action could introduce firefighting and emergency vehicles on neighborhood residential streets.</b> See mitigation measure LU-1 (Section 4.3.7).</p>	<p><b>Inconsistent. The No Action alternative would continue to allow truck traffic from existing landscaping storage operations located on the north side of the Airport.</b></p>

<b>TABLE D2 (Continued)</b>		
<b>City of Monterey General Plan Goals and Policies Consistency Analysis</b>		
<b>Proposed Action and No Action Alternatives</b>		
	<b>Proposed Action Alternative</b>	<b>No Action Alternative</b>
<b>Circulation Element Goals and Policies (continued)</b>		
Goal h. Make public transportation in the City of Monterey an attractive alternative for tourists.	<b>Consistent.</b> The Proposed Action includes a relocated passenger terminal complex that will improve the functional areas of the existing terminal for a better air transportation experience. The Airport is a public use airport that is used to support tourism throughout the Monterey Peninsula region. Increasing its amenities to the public, including tourism, is consistent with this policy.	<b>Inconsistent.</b> The No Action alternative would not provide the airport improvements needed to enhance the future air travel experience.
Goal i. Support the movement of people, goods, and services by other transportation facilities, such as air, rail, and water.	<b>Consistent.</b> The Proposed Action includes a relocated passenger terminal complex that will improve the functional areas of the existing terminal, as well as additional hangar storage, for a better air transportation experience.	<b>Inconsistent.</b> The No Action alternative would not provide the airport improvements needed to enhance the future air travel experience.
Policy i.1. Work with the Airport District and the hospitality industry to provide a direct and affordable transit service between the Monterey Peninsula Airport and the local shuttle service area to reduce congestion.	<b>Consistent.</b> The Proposed Action includes a relocated passenger terminal complex that includes designated shuttle, public transit, taxi, and transportation network company pick-up and drop-off locations. The Airport is a member of the Monterey County Regional Tax Authority.	<b>Some Inconsistency.</b> The No Action alternative would not improve the Airport. However, some transit services could be improved without implementing the Proposed Action.
Policy i.6 Balance the community's need for air transportation service with community safety and environmental needs.	<b>Inconsistent.</b> The Proposed Action could introduce firefighting and emergency vehicles on neighborhood residential streets. See mitigation measure LU-1 (Section 4.3.7).	<b>Inconsistent.</b> The No Action alternative would not provide the airport improvements needed to enhance the future air travel and airfield safety.
Policy i.7. Direct vehicular traffic generated by airport land uses to arterial streets and highways and away from residential neighborhoods.	<b>Inconsistent.</b> The Proposed Action could introduce firefighting and emergency vehicles on neighborhood residential streets. See mitigation measure LU-1 (Section 4.3.7).	<b>Inconsistent.</b> The No Action alternative would not redirect airport traffic from the residential neighborhood west of the Airport.
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.	<b>Not Applicable.</b> The Proposed Action does not include non-aviation uses.	<b>Not Applicable.</b> The No Action alternative does not include non-aviation uses.
Policy i.8. Provide affordable shuttle service to the Monterey Peninsula Airport.	<b>Consistent.</b> The Proposed Action includes a relocated passenger terminal complex that will have designated shuttle areas, which will facilitate the provision of affordable shuttle service.	<b>Inconsistent.</b> The No Action alternative would not improve shuttle opportunities.



<b>TABLE D2 (Continued)</b>		
<b>City of Monterey General Plan Goals and Policies Consistency Analysis</b>		
<b>Proposed Action and No Action Alternatives</b>		
	<b>Proposed Action Alternative</b>	<b>No Action Alternative</b>
<b>Circulation Element Goals and Policies (continued)</b>		
Policy i.10. Support improvements and operational changes at the airport that promote safety and noise reduction.	<b>Consistent.</b> The Proposed Action includes several airside and landside improvements, such as providing additional taxiway to runway separation and consolidating smaller GA operations along the smaller GA runway to enhance the safety of the Airport. The provision of additional hangars is in keeping with GA trends towards more sophisticated (and quieter) aircraft.	<b>Inconsistent.</b> The No Action alternative would not provide the improvements needed to enhance airport safety.
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.	<b>Consistent.</b> The Proposed Action would result in a decrease in ADT through City of Monterey streets and neighborhoods.	<b>Consistent.</b> No additional traffic would be generated by the No Action alternative.
<b>Conservation Element Goals and Policies</b>		
Goal b.1. Protect creeks, lakes, wetlands, beaches, and Monterey Bay from pollutants discharged to the storm drain system. – Policy b.2. Minimize particulate matter pollution with erosion and sediment control in waterways and on construction sites and with regular street sweeping on City streets.	<b>Consistent.</b> The Proposed Action would be required to meet Caltrans and Central Coast RWQCB standards for pre- and post-construction runoff quantities. Best management practices to reduce water pollutants below acceptable levels would be implemented.	<b>Consistent.</b> Under this alternative, no additional airport development would occur.
Goal d. Protect the character and composition of existing native vegetative communities. Conserve, manage, and restore habitats for endangered species, and protect biological diversity represented by special-status plant and wildlife species.	<b>Consistent.</b> The Proposed Action incorporates mitigation to protect and restore biological resources (BIO-1 through BIO-4).	<b>Consistent.</b> Under this alternative, no additional airport development would occur.
– Policy d.1. Protect existing native plants and promote the use of locally occurring, native vegetation for public and private landscaping and revegetation efforts.	<b>Consistent.</b> The Proposed Action is required by the City of Monterey to have landscaping plans incorporating native vegetation to the extent feasible within or adjacent to the 100-foot setback from Highway 68.	<b>Consistent.</b> Under this alternative, no additional airport development would occur.
– Policy d.2. Discourage the use of plant species on the California Exotic Pest Plant Council lists.	<b>Consistent.</b> The City of Monterey prohibits the use of plant species listed on the California Exotic Pest Plant Council lists.	<b>Consistent.</b> Under this alternative, no additional airport development would occur.

**TABLE D2 (Continued)**

**City of Monterey General Plan Goals and Policies Consistency Analysis  
Proposed Action and No Action Alternatives**

	Proposed Action Alternative	No Action Alternative
<b>Conservation Element Goals and Policies (continued)</b>		
<ul style="list-style-type: none"> <li>– Policy d.3. Protect existing sensitive habitats by careful planning to avoid and/or mitigate significant impacts to habitat areas identified as having high and moderate biological values.</li> <li>– Policy d.4. Protect and manage habitats that support special-status species, are of high biological diversity, or are unusual or regionally restricted. Prepare biotic reports or habitat management plans as needed to ensure protection of habitat values.</li> <li>– Policy d.5. Reduce biotic impacts to a less-than-significant level on project sites by ensuring that mitigation measures identified in biotic reports are incorporated as conditions of approval for development projects. Compliance with the City Tree Ordinance is the mechanism that will be used to address impacts of tree removals. As mitigation for significant impacts, avoidance, replacement, restoration of habitats on- or off-site or other measures may be required.</li> <li>– Policy d.6. Within identified habitat areas with high biological value, the City will provide for a focused evaluation of areas identified as appropriate habitat for special-status species during the project review and approval process.</li> </ul>	<p><b>Consistent.</b> The EA analyzes impacts to federally protected species and an environmental impact report (EIR) was prepared to address impacts to state and local protected species. The Proposed Action (as well as the EIR) incorporates mitigation to protect and restore biological resources (BIO-1 through BIO-4).</p>	<p><b>Consistent.</b> Under this alternative, no additional airport development would occur.</p>
<b>Open Space Element Goals and Policies</b>		
<p>Goal c. Preserve greenbelts to ensure an overall visual impression of open space on the hillsides above Monterey, between neighborhoods and along major transportation corridors.</p> <ul style="list-style-type: none"> <li>– Policy c.3. Work with the County and others to preserve Monterey Pines where possible.</li> </ul>	<p><b>Consistent.</b> The Proposed Action is required by the City of Monterey to have landscaping plans incorporating native vegetation to the extent feasible within or adjacent to the 100-foot setback from Highway 68. The landscaping plans shall include native species, protect existing cypress, Monterey pine and coast live oak trees to the extent possible, and use trees to screen parking, where appropriate.</p>	<p><b>Consistent.</b> Under this alternative, no additional airport development would occur.</p>

**TABLE D2 (Continued)**  
**City of Monterey General Plan Goals and Policies Consistency Analysis**  
**Proposed Action and No Action Alternatives**

	Proposed Action Alternative	No Action Alternative
<b>Safety Element Goals and Policies</b>		
– Policy c.4. Design projects to: (1) maximize the amount of natural drainage that can be percolated into the soil, and (2) minimize direct overland runoff onto adjoining properties, water courses, and streets. This approach to handling stormwater reduces the need for costly storm drainage improvements, which are often miles downstream. Building coverage and paved surfaces must be minimized and incorporated within a system of porous pavements, ponding areas, and siltation basins.	<b>Consistent.</b> The Proposed Action includes stormwater detention basins along its frontage with Highway 68 to reduce post-construction runoff to pre-construction rates to meet Caltrans and Central Coast RWQCB standards for pre- and post-construction runoff quantities. Best management practices to reduce water pollutants below acceptable levels would be implemented.	<b>Consistent.</b> Under this alternative, no additional airport development would occur.
Goal d. Minimize the loss of life and property from fire.	<b>Not Applicable.</b> The Airport is not responsible for providing fire protection to the City of Monterey.	<b>Not Applicable.</b> The Airport is not responsible for providing fire protection to the City of Monterey.
Goal e. Maximize aviation safety on and adjacent to the Monterey Airport. – Policy e.1. Support safety improvements to the Monterey Peninsula Airport and adjacent areas.	<b>Consistent.</b> The Proposed Action includes several airside and landside improvements to enhance the safety of the Airport. The Airport will continue to communicate with the city, as appropriate, to help ensure that future land uses are compatible with airport safety concerns.	<b>Inconsistent. The No Action alternative would not provide the airport improvements needed to enhance safety.</b>
– Policy e.2. Continue to work with the airport district through a fire mutual aid agreement.	<b>Not Applicable.</b> The Airport is not responsible for providing fire protection to the City of Monterey.	<b>Not Applicable.</b> The Airport is not responsible for providing fire protection to the City of Monterey.
<b>Noise Element Goals and Policies</b>		
Goal a. Minimize traffic noise in predominantly residential areas and ensure noise in commercial areas is an acceptable level. – Policy a.1 Limit truck traffic to local delivery.... – Policy a.2. Route trucks and through traffic onto truck routes, even where such routing is not the shortest distance between points.	<b>Consistent.</b> The Proposed Action would result in a decrease in ADT through City of Monterey streets and neighborhoods.	<b>Inconsistent. The No Action alternative would not redirect airport traffic from the residential neighborhood west of the Airport.</b>

**TABLE D2 (Continued)**  
**City of Monterey General Plan Goals and Policies Consistency Analysis**  
**Proposed Action and No Action Alternatives**

	Proposed Action Alternative	No Action Alternative
<b>Noise Element Goals and Policies (continued)</b>		
Policy b.1. Support improvements and operational changes at the airport that support safety and noise reduction.	<b>Consistent.</b> The Proposed Action includes several airside and landside improvements to enhance the safety of the Airport, such as providing additional taxiway to runway separation and consolidating smaller GA operations along the smaller GA runway. The provision of additional hangars is in keeping with GA trends towards more sophisticated (and quieter) aircraft.	<b>Inconsistent. The No Action alternative would not provide the airport improvements needed to enhance safety.</b>
Policy b.4. Support limiting the number of fixed-base general aviation aircraft at the airport to the existing number.	<b>Not Applicable.</b> This policy is not consistent with the federal grant assurances under which the Airport must operate. Grant Assurance No. 22, Economic Nondiscrimination, states, in part, that the Airport must “make the airport available for public use on reasonable terms and without unjust discrimination to all types, kinds and classes of aeronautical activities...”	<b>Not Applicable.</b> The consistency analysis for the Proposed Action is also applicable to this alternative.

Source: City of Monterey 2016

<b>TABLE D3 Casanova-Oak Knoll Neighborhood Plan Goals and Policies Consistency Analysis Proposed Action and No Action Alternatives</b>		
	<b>Proposed Action Alternative</b>	<b>No Action Alternative</b>
<b>Public Works Goals and Policies</b>		
Policy 15: Oppose the use of Casanova Avenue and Airport Road for any additional airport-related traffic.	<b>Consistent.</b> The Proposed Action would result in a decrease in ADT through City of Monterey streets and neighborhoods.	<b>Consistent.</b> The No Action would not change the use of Casanova Avenue and Airport Road for airport-related traffic.
Policy 16: Improve traffic flow and safety along Airport Road.	<b>Inconsistent. The Proposed Action could introduce firefighting and emergency vehicles on neighborhood residential streets.</b> See mitigation measure LU-1 (Section 4.3.7).	<b>Inconsistent. The No Action alternative would not improve traffic flow and safety along Airport Road within the Casanova Oak Knoll neighborhood.</b>
<b>Airport Noise Goals and Policies</b>		
Goal 1. To make the Monterey Peninsula Airport and its affected neighborhoods and communities mutually compatible.	<b>Consistent.</b> The Proposed Action would result in a decrease in ADT through City of Monterey streets and neighborhoods.	<b>Consistent.</b> No changes to existing airport operations and facilities would occur with this alternative.
Goal 5. To work together to design, achieve, and maintain a level of local air service that will be compatible with community social and economic needs as well as environmental consideration.	<b>Consistent.</b> The Proposed Action identifies avoidance and minimization measures that balance local air service with community and environmental needs.	<b>Consistent.</b> No changes to existing airport operations and facilities would occur with this alternative.
The <i>Casanova-Oak Knoll Neighborhood Plan</i> incorporates City of Monterey general plan Policies 23 - 35, many of which are no longer included in the current general plan. However, Policies 25 and 27 are encompassed by city general plan Policies b.1 and b.4 of its Noise Element (see <b>Table D2</b> ). Other policies applicable to the Proposed Action, although no longer included in the city general plan, remain a part of the <i>Casanova-Oak Knoll Neighborhood Plan</i> , as discussed below:		
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.	<b>Inconsistent. The Proposed Action could introduce firefighting and emergency vehicles on neighborhood residential streets.</b> See mitigation measure LU-1 (Section 4.3.7).	<b>Consistent.</b> No new aviation development of the north side of the Airport would occur.
Policy 32. Reduce Airport related environmental hazards. – Program 32b: Oppose the storage of aviation fuel and other hazardous material on the north side of the Airport within 500 feet of the neighborhood and within drainage courses that could drain into the neighborhood.	<b>Consistent.</b> The Proposed Action includes the storage of aviation fuel on the north side GA area, but this storage would not be within 500 feet of a neighborhood or within a drainage course.	<b>Consistent.</b> No changes to existing airport fuel storage would occur with this alternative.
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.	<b>Inconsistent. The Proposed Action could introduce firefighting and emergency vehicles on neighborhood residential streets.</b> See mitigation measure LU-1 (Section 4.3.7).	<b>Inconsistent. The No Action alternative would not reduce airport traffic from the Casanova Oak Knoll neighborhood.</b>
Source: City of Monterey 1985		





Appendix E

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*NATIONAL HISTORIC PRESERVATION ACT,  
SECTION 106 CONSULTATION*



**DEPARTMENT OF PARKS AND RECREATION  
OFFICE OF HISTORIC PRESERVATION**

Lisa Ann L. Mangat, Director

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000 FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

April 08, 2020

In Reply Refer to FAA\_2020\_0224\_001

Douglas R. Pomeroy, Environmental Protection Specialist  
Western-Pacific Region, Airports Division  
San Francisco Airports District Office  
Federal Aviation Administration  
1000 Marina Blvd., Suite 220  
Brisbane, CA 94005-1863

RE: Proposed Taxiway "A" Relocation and Associated Building Relocations Project,  
Monterey Regional Airport, California (your letter of February 19, 2020)

Dear Mr. Pomeroy:

The Federal Aviation Administration (FAA) is initiating consultation with the State Historic Preservation Officer (SHPO) in accordance with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108), as amended, and its implementing regulation found at 36 CFR Part 800.

The FAA is reviewing the Monterey Peninsula Airport District's (MPAD) proposal to implement the Proposed Taxiway "A" Relocation and Associated Building Relocation Project (proposed undertaking) at the Monterey Regional Airport (MRY). The proposed undertaking and the area of potential effects (APE) are described adequately in the FAA's submission.

As documentation for your determination, you provided: (1) a report prepared by Leroy Laurie and Dr. Heather Gibson of SWCA and dated October 2018 and (2) a technical memorandum prepared by Mr. Laurie and dated September 30, 2019. . A records review was conducted at the Northwest Information Center at Sonoma State University on June 2, 2014 which identified three cultural resources as being located within the APE. Those three cultural resources are described succinctly as follows:

- 1) CA-MNT-1438/H – an archaeological sites that was identified during construction monitoring for a previous construction project in 2014. Since the site could not be avoided, it was considered to be eligible for listing on the National Register of Historic Places (NRHP) and a data recovery program was implemented. The excavated cultural material was redeposited in an area within MRY that is outside of the APE for the current proposed undertaking. Consequently, the current proposed undertaking will have no effect on the historic property associated with the prior CA-MNT-1438/H site.
- 2) MRY-HIST-001 – the foundational remnants of a former target shooting range that was demolished previously. The FAA evaluated the site and concluded that it had no integrity and was not eligible for listing on the NRHP.
- 3) P-27-1459 – the Tarp's Roadhouse/Ryan House that was determined previously to be eligible for listing on the NRHP. The nearest project component to this building is a proposed haul road that is located 175 feet west of it. Consequently, the proposed

undertaking will neither directly nor indirectly impair the integrity or significance of this historic property.

SWCA personnel conducted pedestrian surveys of the APE on April 26, 27, and 28, 2017, and March 17 and 18, 2018. They identified no new cultural resources in the APE.

After contacting the Native American Heritage Commission (NAHC), on November 29, 2019, the FAA contacted the tribes or tribal groups, identified by NAHC, with request for comment letters. Two tribes responded as follows:

- The Ohlone/Constanoan-Esselen Nation requested tribal consultation and recommend the use of tribal cultural monitors, which the FAA will do: and
- The Salinan Tribe of Monterey/San Luis Obispo Counties stated that the MRY was located within a traditional Salinan tribal area; the Salinan tribe consider it likely that archaeological resources would be encountered during construction; the Salinan tribe recommended the use of tribal cultural monitors, and the Salinan tribe wanted to review the Draft Environmental Assessment for the proposed undertaking.

The MPAD developed an archaeological monitoring plan than included four mitigation and monitoring measures that MPAD intends to implement to avoid and address environmental impacts to any unknown cultural resources that may be inadvertently discovered during the proposed undertaking. In its final environmental assessment, the FAA included those mitigation measures.

The FAA requested that the SHPO concur with your identification of the APE and determination of No Historic Properties Affected. Having reviewed the information submitted with your letter, the SHPO offers the following comments:

- The SHPO has no objections to your identification and delineation of the APE, pursuant to 36 CFR Parts 800.4(a)(1) and 800.16(d);
- The SHPO believes that a finding of No Historic Properties Affected is appropriate for this undertaking and concurs with that finding.

Be advised that under certain circumstances, such as an unanticipated discovery or a change in project description, you may have additional future responsibilities for this undertaking under 36 CFR Part 800. Should you encounter cultural artifacts during ground disturbing activities, please halt all work until a qualified archaeologist can be consulted on the nature and significance of such artifacts.

Thank you for considering historic resources during project planning. If you have any questions or comments, please contact Tristan Tozer of my staff at (916) 445-7027 or by email at [Tristan.Tozer@parks.ca.gov](mailto:Tristan.Tozer@parks.ca.gov).

Sincerely,



Julianne Polanco  
State Historic Preservation Officer



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Airports Division

San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005

February 19, 2020

Ms. Julianne Polanco  
State Historic Preservation Officer  
California Office of Historic Preservation  
1725 23<sup>rd</sup> Street – Suite 100  
Sacramento, California 95816

Subject: Monterey Regional Airport Proposed Taxiway “A” Relocation and Associated Building Relocations Project: Submittal of Determination of No Historic Properties Affected by Proposed Project in Accordance with the National Historic Preservation Act (NHPA), Section 106, Consultation Process.

Dear Ms. Polanco:

The Monterey Peninsula Airport District (MPAD) is proposing a multiphased airport safety project, Proposed Taxiway “A” Relocation and Associated Building Relocation Project (proposed undertaking), at Monterey Regional Airport (MRY). With submittal of this letter the Federal Aviation Administration (FAA) is initiating National Historic Preservation Act (NHPA), Section 106, consultation for this project at this time.

A Risk Assessment conducted in support of the MRY Airport Master Plan found that increasing the runway centerline to taxiway centerline distance from 275 feet to a uniform 327.5 feet would reduce the risk of an aircraft accident to less than one accident per 10,000,000 landings. This metric is used by the FAA to establish most of the airfield design standards. Due to limited space at MRY, a number of building demolitions and relocations are required to implement this project.

The attached figures and exhibit depict the project and Area of Potential Effect (APE):

- Figure 1: Vicinity/Location map
- Figure 2: Area of Potential Effect and Project Location depicted on a portion of the Seaside 7.5 Minute Series U.S. Geological Survey Topographic Map
- Figure 3: Area of Potential Effect depicted on aerial photograph
- Exhibit 1C: Proposed Project Phasing

The project components include:

1. Increase the centerline to centerline separation distance between Runway 10R-28L and the adjacent parallel Taxiway “A” to a uniform separation distance of 327.5 feet for the entire length of Taxiway “A” by relocating an approximately 1,850-linear-foot (lf) portion of Taxiway “A” south by 52.5 feet. Currently, that

1,850 If portion of Taxiway “A” is only 275 feet from the centerline of Runway 10R-28L.

2. Provide apron islands for Taxiways “G” and “J” at their connections with Taxiway “A” to prevent direct access from the adjacent apron to Runway 10L-28R.
3. Relocate existing “hold lines” on Taxiway “A” at Taxiways “G” and “J” 50 feet farther from the centerline of Runway 10R-28L so that hold lines that are currently 200 feet from the centerline of Runway 10R-28L will then be 250 feet from the centerline of Runway 10R-28L.
4. Demolish the existing approximately 70,000-square-foot (sf) passenger terminal building, constructed in 1950 and which includes five boarding gates, the 5.6-acre terminal aircraft parking apron located south of Taxiway “A” between Taxiway “G” and Taxiway “J,” and an associated 576 automobile parking spaces (located east of Olmsted Road and north of Fred Kane Drive). Replace these facilities with an approximately 100,000-sf terminal building, located south of Taxiway “A” between Taxiway “J” and Taxiway “K,” and an approximately 13.1-acre terminal aircraft parking apron. Construct new vehicle parking lots south and west of the new passenger terminal and apron (787 public and employee automobile parking spaces and 110 spaces for a rental car ready/return lot). This work is necessary to accommodate the relocation of Taxiway “A” and to provide additional automobile parking.
5. Close Taxiway “K” so that there will be no direct access via Taxiway “K” from the relocated terminal aircraft parking apron to Runway 10R-28L.
6. Remove the existing three-acre southeast general aviation (GA) apron and hangar area, including approximately 126,000 sf of hangar space, and relocate approximately 44 GA tenants to the north side of the Airport. Replace the existing southeast GA apron and hangar area with the new passenger terminal complex and aircraft parking apron. The hangar space would be replaced with approximately 90,500 sf of T-hangar, box hangar, and executive hangar space, buildable hangar pads that could accommodate an additional 35,500 sf of hangar space, and associated infrastructure in the GA hangar area located north of Runway 10L-28R. Approximately 27 vehicular parking spaces would be provided in this area with a net increase in vehicular parking of seven spaces. The north GA apron would be reduced by approximately 1,000 sf to accommodate a new taxiway, and the southeast GA apron would not be replaced.
7. Demolish the existing aircraft rescue and firefighting (ARFF) building, which is located where the new passenger terminal apron will be constructed. Construct a new ARFF building on north GA apron.
8. Concurrent with the site preparation for the north side GA area, build an extension of the east vehicle service road to the existing terminus of Airport Road at the



north GA apron to provide a construction haul route for the Proposed Action and a service road to the north GA area from both sides of the Airport.

9. Provide areas on the north side of the Airport for stockpiling or depositing excess cut material created by the Proposed Action.

A cultural resources consultant retained by the MPAD to evaluate the MRY project recommended a finding of “No Historic Properties Affected” for the proposed project. The consultant’s findings are provided in their *Technical Memorandum* (attached) dated September 30, 2019, which evaluated the effects of the proposed project based on the cultural resources identified and evaluated in the October 2018 *Cultural Resources Survey Report for the Monterey Regional Airport, Monterey County, California (Cultural Resources Survey)* (attached).

The FAA had deferred initiating NHPA, Section 106, consultation as the MPAD was finalizing the components of this project. After preparation of the *Technical Memorandum* and *Cultural Resources Survey*, MRY eliminated some of the roads on the east side of MRY from the project, resulting in a slightly smaller APE. The attached Figures 2 and 3 show the current APE, and should be considered as updates to the APE figure in the *Technical Report (Technical Report Attachment A – Figure 1)*. Similarly, the *Cultural Resources Survey, Figure 2, Study Area Map*, also includes in the study area some proposed roads that have been eliminated from the project. The minor reduction in the APE does not affect the validity of the findings in the *Technical Memorandum*, as all areas in the current APE were included in the slightly larger APE that was previously evaluated in the *Technical Memorandum*.

As discussed in the *Technical Memorandum*, two archaeological resource site locations – CA\_MNT-1438/H and MRY-HIST-001- are within the Airport Safety Enhancement Project APE.

The CA\_MNT-1438/H site was a portion of a prehistoric archaeological site. The portion of CA\_MNT-1438/H within the APE for this project was discovered during construction of the prior MRY Runway Safety Area (RSA) project in 2014.

The project requirements of 2014 RSA project necessitated excavation and removal of the entire CA-MNT-1438/H site within the APE for that project. As the CA\_MNT-1438/H could not be avoided, it was considered eligible for the National Register of Historic Places (NRHP), and a data recovery program was undertaken. The results of the data recovery effort, and redeposit of cultural materials is described in the 2016 report, *Data Recovery Report for Portions of CA-MNT-1438/H, Monterey Peninsula Airport District, Monterey, County*, prepared by Pacific Legacy Inc., which was previously provided to your office.

The APE for the Proposed Taxiway “A” Relocation and Associated Building Relocations Project in the vicinity of CA-MNT-1438/H completely overlaps the area within the APE for the 2014 RSA project where archaeological data recovery occurred. Therefore, no portion of the CA-MNT-1438 site remains within the APE for the Proposed Taxiway “A” Relocation and Associated Building Relocations Project. The cultural material redeposited from CA-MNT-1438/H is located outside the APE for the Proposed Taxiway

“A” Relocation and Associated Building Relocations Project. Therefore, the proposed project would have no effect on historic property associated with the prior CA-MNT-1438/H site.

The historic archaeological site MRY-HIST-001 consists of the foundational remnants of a target shooting range facility. As described in more detail in the *Technical Memorandum*, MAY-HIST-001 was evaluated found not eligible for the National Register of Historic Places. Therefore, the removal of the MRY-HIST-001 site would not represent an effect on a historic property.

As discussed in the *Technical Memorandum*, there is one historic structure within the APE. Tarpy’s Roadhouse/Ryan House (P-27-1459) and associated features are eligible for listing on the National Register of Historic Places under Criterion C at the local level of significance due to the use of native stone in the building and its Arts-and-Crafts-influenced architectural style. The nearest project component to Tarpy’s Restaurant is a proposed haul road which is 175 feet west of the building and 75 feet in elevation about the building. The project proposes no actions which would either directly or indirectly impair the integrity or significance of this historic property.

The FAA has independently reviewed the determinations in the *Technical Memorandum*, and concurs with its conclusions that no historic properties would be affected by implementation of the Proposed Taxiway “A” Relocation and Associated Building Relocations Project.

Although the FAA has made a finding of no historic properties affected, the MPAD intends to implement a series of cultural resources mitigation and monitoring measures. By letter of February 13, 2020 (attached), the MPAD has advised the FAA of a series of mitigation and monitoring measures, including an archaeological monitoring plan, the MPAD intends to implement to avoid and address environmental impacts to any unknown historic resources that may be present or uncovered during construction. These measures will be included in the Draft Environmental Assessment, which will be circulated for public review and comment.

The FAA is coordinating with Native American tribal groups regarding the proposed project. By letter of November 29, 2019, the FAA contacted Native American organizations potentially having an interest in the proposed project, and requested they respond within 30 days of our letter.

The Ohlone/Constanoan-Esselen Nation (OCEN) responded to the FAA letter on January 16, 2020 requesting consultation under California state law in accordance with AB52/SB18. The MPAD have advised us that they previously completed an AB52/SB18 consultation with OCEN as part of coordination for their overall Airport Master Plan, which included the Proposed Taxiway “A” Relocation and Associated Building Relocation Projects, during their California Environmental Quality Act (CEQA) evaluation of that project. The MPAD is proposing to retain an OCEN representative as a tribal monitor to work with a consultant archaeological monitor for this project as described in the *Technical Memorandum, Appendix A - Archaeological Monitoring Plan*. The FAA will continue tribal coordination, including providing the OCEN a copy of this

letter, to determine if the OCEN propose any other actions in addition to those identified in the *Archaeological Monitoring Plan*.

The Salinan Tribe of Monterey/San Luis Obispo Counties responded to the FAA letter with a telephone call on February 7, 2020. The Salinan Tribal Representative stated the following information and issues: (1) MRY was part of the traditional Salinan tribal areas; (2) The Salinan tribe consider it likely that archaeological resources would be encountered during construction; (3) The Salinan tribe would like to have a tribal monitor to monitor excavation activities; and (4) The Salinan tribe would like to review the Draft Environmental Assessment for the proposed project.

As the Salinan Tribe did not contact the MPAD during the prior MPAD AB52/SB18 tribal outreach associated with the MPAD's Airport Master Plan CEQA process, the MPAD has not committed at this time to retain the Salinan Tribe as a tribal monitor for this project. The FAA will continue tribal coordination, including providing the Salinan Tribe with a copy of this letter, providing a copy of the Draft Environmental Assessment for review, determining if the MPAD would commit to retaining a Salinan tribal monitor to work with the consultant archaeological monitor, and determining if the Salinan Tribe proposes any other actions regarding their tribal concerns associated with the construction of this project.

In accordance with Title 36 Code of Federal Regulations § 800.4(d)(1) we request that your office advise us within 30 days of receipt of this letter if you have any objection to the FAA conclusions described in this letter.

Should you have questions regarding this letter, please telephone me at (650) 827-7612, e-mail me at [douglas.pomeroy@faa.gov](mailto:douglas.pomeroy@faa.gov), or contact me by mail at the letterhead address.

Sincerely,

*Original signed by*

Douglas R. Pomeroy  
Environmental Protection Specialist

Attachments

Copy to:

Chris Morello, Senior Manager for Development and Environment, Monterey Peninsula Airport District. Without attachments.

Louise J. Miranda Ramirez, Chairperson, Ohlone/Costanoan-Esselen Nation  
With attachments.

Fredrick Segobia, Tribal Representative, Salinan Tribe of Monterey/San Luis Obispo Counties. With attachments.

## TECHNICAL MEMORANDUM

**To:** Judi Krauss, Coffman Associates

**cc:** Chris Morello, Deputy Director of Strategy and Development, Monterey Regional Airport  
Doug Pomeroy, Environmental Protection Specialist, Federal Aviation Administration

**From:** Leroy Laurie, Cultural Resources Team Leader, SWCA Environmental Consultants

**Date:** September 30, 2019

**Re:** **Recommended Finding of No Historic Properties Affected for the Airport Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations Project at Monterey Regional Airport, Monterey County, California / SWCA Project No. 37212**

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### INTRODUCTION

SWCA Environmental Consultants (SWCA) was retained by Coffman Associates to prepare the following technical studies in support of proposed developments associated with the Monterey Regional Airport (MRY) Airport Master Plan.

- *Historic Resources Assessment Report, Monterey Regional Airport, Monterey, California* (SWCA 2014);<sup>1</sup>
- *Supplemental Historic Resources Assessment for Monterey Regional Airport, Monterey County, California* (SWCA 2017);<sup>2</sup> and
- *Cultural Resources Survey Report for the Monterey Regional Airport, Monterey County, California* (CRSR).<sup>3</sup>

This memorandum addresses one primary aspect of the Airport Master Plan, the Airport Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations (Airport Safety Enhancement Project). Due to the need for federal funding and approval, a federal Environmental Assessment (EA) is also being prepared consistent with the requirements of the National Environmental Policy Act (NEPA). The Federal Aviation Administration (FAA) is the lead agency for the EA. The

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<sup>1</sup> SWCA Environmental Consultants (SWCA). 2014. *Historic Resources Assessment and Survey Report, Monterey Regional Airport, Monterey, California*. Prepared for Coffman Associates by SWCA Environmental Consultants, San Luis Obispo, California.

<sup>2</sup> SWCA. 2017. *Supplemental Historic Resources Assessment for Monterey Regional Airport, Monterey County, California*. Prepared for Coffman Associates by SWCA Environmental Consultants, San Luis Obispo, California.

<sup>3</sup> SWCA. 2018. *Cultural Resources Survey Report for the Monterey Regional Airport*. Submitted to Monterey Regional Airport and the Northwest Information Center. On file with the Airport and SWCA.

forementioned technical studies included the entire 120-acre Area of Potential Effects (APE) established for the Airport Safety Enhancement Project (Attachment A) and areas outside of the APE for related but not federally funded components of the Airport Master Plan

## ARCHAEOLOGICAL RESOURCES

Two archaeological resources—CA-MNT-1438/H and MRY-HIST-001—are within the Airport Safety Enhancement Project APE.

Historic archaeological site MRY-HIST-001 consists of the foundational remnants of a target shooting range facility (personal communication with Chris Morello, MRY Project Manager, via email on April 10, 2018). The foundation is partially demolished, as evidenced by concrete debris piles adjacent to the site. Although partially obscured by dense vegetation, the visible portion of the foundation measures approximately 100 feet (northwest/southeast) by 35 feet (northeast/southwest).<sup>4</sup>

Historic archaeological site MRY-HIST-001 is not associated with any significant events or people (Criterion A/1 and B/2), the foundation is a typical example of construction type and material (Criterion C/2), the site does not have the ability to provide additional information regarding the history of the airport or region beyond what is already well-documented (Criterion D/4), and the site lacks integrity. As such, the site does not constitute a historic property and warrants no further consideration.<sup>5</sup>

A portion of CA-MNT-1438/H was encountered during construction monitoring for the MRY Runway Safety Area (RSA) Improvement Project, which overlaps with the Airport Safety Enhancement Project APE. As the portion of the archaeological site could not be avoided by the RSA project, it was assumed eligible for the NRHP/CRHR, and Pacific Legacy, Inc. undertook a data recovery program to mitigate impacts to the site. Following mitigation through data recovery, the portion of the site within the RSA's direct APE (which overlaps with the current APE) was entirely destroyed by project-related excavations. Data recovery excavations revealed a diverse prehistoric assemblage with multiple subsurface features, and human remains. In addition, all site-associated soils were excavated and relocated to an area on the airport known to not contain archaeological resources.<sup>6</sup> The redeposited site material is outside of the current project's APE. As the resource was entirely excavated and relocated outside of the current APE, the proposed project will not affect the archaeological component of CA-MNT-1438/H.

SWCA<sup>7</sup> concluded that although no known archaeological resources that may constitute historic properties will be affected by the Airport Safety Enhancement Project, the following mitigation measures were recommended:

1. Prior to project implementation, a qualified archaeologist should conduct a cultural resource awareness training for all construction personnel, which should include the following:
  - Review the types of prehistoric and historic resources that may be uncovered;
  - Provide examples of common prehistoric and historic archaeological artifacts to examine;
  - Review what makes an archaeological resource significant to archaeologists and local native Americans;

<sup>4</sup> SWCA 2018.

<sup>5</sup> SWCA 2018.

<sup>6</sup> Holm, Lisa, Elena Reese, Amber Barton, Ashlee Bailey, Samantha Schell, Mary O'Neill, Amy Kovak, Shanna Streich, and Ryan Gross. 2016. *Data Recovery Report for Portions of CA-MNT-1438/H, Monterey Peninsula Airport District, Monterey County*. Prepared for Monterey Peninsula Airport District and Kimley-Horn and Associates, Inc. by Pacific Legacy, Inc., Berkeley, California.

<sup>7</sup> SWCA 2018.



- Describe procedures for notifying involved or interested parties in case of a new discovery;
  - Describe reporting requirements and responsibilities of construction personnel;
  - Review procedures that shall be used to record, evaluate, and mitigate new discoveries; and
  - Describe procedures that would be followed in the case of discovery of disturbed as well as intact human burials and burial-associated artifacts.
2. In the event that cultural resources are exposed during project implementation, work should stop in the immediate vicinity, and an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards should be retained to evaluate the find and recommend relevant mitigation measures.
3. If human remains are encountered, then the procedures outlined by the California Native American Heritage Commission (NAHC), in accordance with California Health and Safety Code (CHSC) Section 7050.5 and Public Resources Code (PRC) Section 5097.98, would be followed. If the monitor determines that a discovery includes human remains:
- All ground-disturbing work within the immediate vicinity of the find (50 feet) would halt.
  - The archaeologist would contact the Monterey County Coroner:
    - Monterey County Sheriff-Coroner  
1414 Natividad Road  
Salinas, CA 93906  
Phone: (831) 647-7792
  - As a courtesy, the archaeologist would also notify the NAHC:
    - Native American Heritage Commission  
915 Capitol Mall, Room 364  
Sacramento, California 95814  
Phone: (916) 373-3710  
Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)
  - The coroner would have 2 working days to examine the remains after being notified in accordance with CHSC Section 7050.5. If the coroner determines that the remains are Native American and are not subject to the coroner's authority, the coroner has 24 hours to notify the NAHC of the discovery.
  - The NAHC would immediately designate and notify the Native American Most Likely Descendant (MLD), who will have 48 hours after being granted access to the location of the remains to inspect them and make recommendations for treatment of them.
4. In areas of dense vegetation that have not been subject to extensive prior disturbance, SWCA recommends that an Archaeological Monitoring Plan be developed prior to project implementation. The Archaeological Monitoring Plan should include (but not be limited to) the following:
- A list of personnel involved in the monitoring activities;
  - Description of how the monitoring shall occur;
  - Description of frequency of monitoring (e.g., full time, part time, spot checking);
  - Description of what resources are expected to be encountered;
  - Description of circumstances that would result in the halting of work at the project site;
  - Description of procedures for halting work on the site and notification procedures;
  - Description of monitoring reporting procedures; and

- Provide specific, detailed protocols for what to do in the event of the discovery of human remains.

The Archaeological Monitoring Plan is provided as Attachment B.

## HISTORIC RESOURCES

In 2014, SWCA completed a historic resources survey and evaluation of MRY to identify airport properties that may be eligible for national, state, or local designation, either individually or as part of a historic district.<sup>8</sup> As a result of the study, 21 properties were subject to intensive-level survey. Research conducted in support of the study identified two principal themes of significance for the airport: (1) World War II era, defense-related development; and (2) the early history and development of aviation on the Monterey Peninsula. While a number of properties on the airport were found to reflect these themes of significance, only one of the surveyed properties appeared eligible for national, state, or local landmark listing—Tarpy’s Roadhouse/Ryan House (P-27-1459), constructed between 1919 and 1925 on the southeastern portion of the airport property (prior to the development of the airport). For airport-related properties, ineligibility was primarily due to significant alterations. With the exception of Tarpy’s Roadhouse/Ryan House, none of the surveyed properties appear eligible for national, state, county, or local listing under other applicable criteria, either individually or as contributors to historic districts.

Since the entire airport was considered in 2014, five buildings have come of age: Buildings 72, 99, 102, 104, and 106, all of which were constructed in 1970. SWCA conducted a supplemental built environment study, which included evaluation of four of the five aforementioned buildings (the fifth, Building 72, was found to be demolished).<sup>9</sup> None of the four recently evaluated buildings are eligible on their own, or as contributing elements to a district, at a national, state, or local level for the NRHP or CRHR.

Table 1 provides details regarding buildings to be demolished as part of the proposed project. None of the buildings slated for demolition that have been evaluated are NRHP eligible. The remainder are greater than 50 years of age and are typical examples of airport-related infrastructure. Photographs and locations of buildings at MRY, including those listed in Table 1, are provided in Attachment A.

**Table 1. Buildings to be Demolished as Part of Proposed Action**

Building Inventory #	Description of Building	Year Built	Year Modified	Original Square Feet	Modified Square Feet	Surveyed	DPR Form Prepared	Eligibility Status
110	Maintenance Hangar	Circa 2000	N/I	N/I	N/I	No	No	N/A
120	FBO Maintenance	Circa 1975	N/I	N/I	N/I	No	No	N/A
124	Hangar	Post-1981	N/I	N/I	N/I	No	No	N/A
130	Hangar	Circa 1965	N/A	12,060	N/A	Yes	Yes	Not eligible
140	Hangar	Circa 1965	N/A	17,472	N/A	Yes	Yes	Not eligible
150	Public Safety Building	1977	2001	6,156	11,404	No	No	N/A
200	Terminal Building	1949/1950	1949,1959, 1971,1973,	15,404	73,988	Yes	Yes	Not eligible

<sup>8</sup> SWCA 2014.

<sup>9</sup> SWCA 2017.

Building Inventory #	Description of Building	Year Built	Year Modified	Original Square Feet	Modified Square Feet	Surveyed	DPR Form Prepared	Eligibility Status
			1974, 1997, 2000					
1600	Navy Flying Club (portable)	1962	N/A	2,000	N/A	Yes	Yes	Not eligible
P1-P6	Six Port-a-Port hangars	Circa 1976	Moved to present location in 2008	8,400 (total)	N/A	No	No	N/A

Source: SWCA 2014.

Note: DPR = Department of Parks and Recreation; N/I = no information; N/A = not applicable; FBO = fixed base operator

### Tarpy's Roadhouse/Ryan House (P-27-1459)

The historic core of the subject property was constructed between 1919 and 1925 as a residence by the owner, Charles A. Ryan. The residential property, converted to its current restaurant use in the 1940s, was determined eligible for the NRHP in 1994. The eligibility determination stated that the house and its associated masonry features, handcrafted by Ryan using native stone excavated from the adjacent hillside, was significant under Criterion C as a historic district, at the local level of significance, for its use of native stone and for its Arts-and-Crafts-influenced architectural style. The driveway entrance to the property is flanked by Ryan's stone masonry pillars and low retaining walls; other buttressed retaining walls demarcate different levels of the paved parking lot. The Ryans' masonry residence and other restaurant buildings form a compact assemblage set farther back on the parcel, separated from the adjoining highway corridor by extensive landscaping. The former residence, the oldest architectural resource on the property, is somewhat tucked away at the base of the hillside, where the soil and rocks were excavated in the late 1910s. The incorporation of native stone, and the Ryan family's personal craftsmanship and efforts in constructing their own home clearly align with important aspects of the Arts and Craft movement's emphasis on the hand-made, using traditional skills and natural materials. The buildings are self-contained, inasmuch as their significance does not rely on their immediate surroundings. The stone and other architectural features are robust and able to withstand (as they already have) alterations to the setting.

The proposed use of a haul road above and to the west of Tarpy's will not result in either direct or indirect effects to the historic property. The road is entirely on airport property and will not entail the acquisition of any portion of the adjacent Tarpy's parcel. The nearest point of the proposed road is located 175 feet west and 75 feet above the building. This location is fenced and screened by a substantial retaining wall on airport property and is also well screened by a dense stand of mature trees and other vegetation present on the grounds of the historic property. The project proposes no actions which would either directly or indirectly impair the integrity or significance of the historic property.

Because of the substantial difference in the elevation of the haul road and the historic property, the project will be effectively out of Tarpy's viewshed. There is, therefore, no potential for project-related shadow effects or visual intrusions to further compromise the setting. Given the immediate proximity of the landing strip and a flight path which regularly directs landing aircraft immediately overhead, any potential indirect effects from additional noise would also be non-existent.

## CONCLUSION

Given the results of past and recent cultural resources studies conducted at MRY, the Airport Safety Enhancement Project SWCA recommends a finding of No Historic Properties Affected for the project.

If you have any questions, please feel free to contact me directly at (805) 543-7095, extension 6805, or email me at [llaurie@swca.com](mailto:llaurie@swca.com).

Sincerely,



Leroy Laurie  
Cultural Resources Team Leader



Heather Gibson, Ph.D., RPA  
Principal Investigator

# **ATTACHMENT A**

## **Figures**



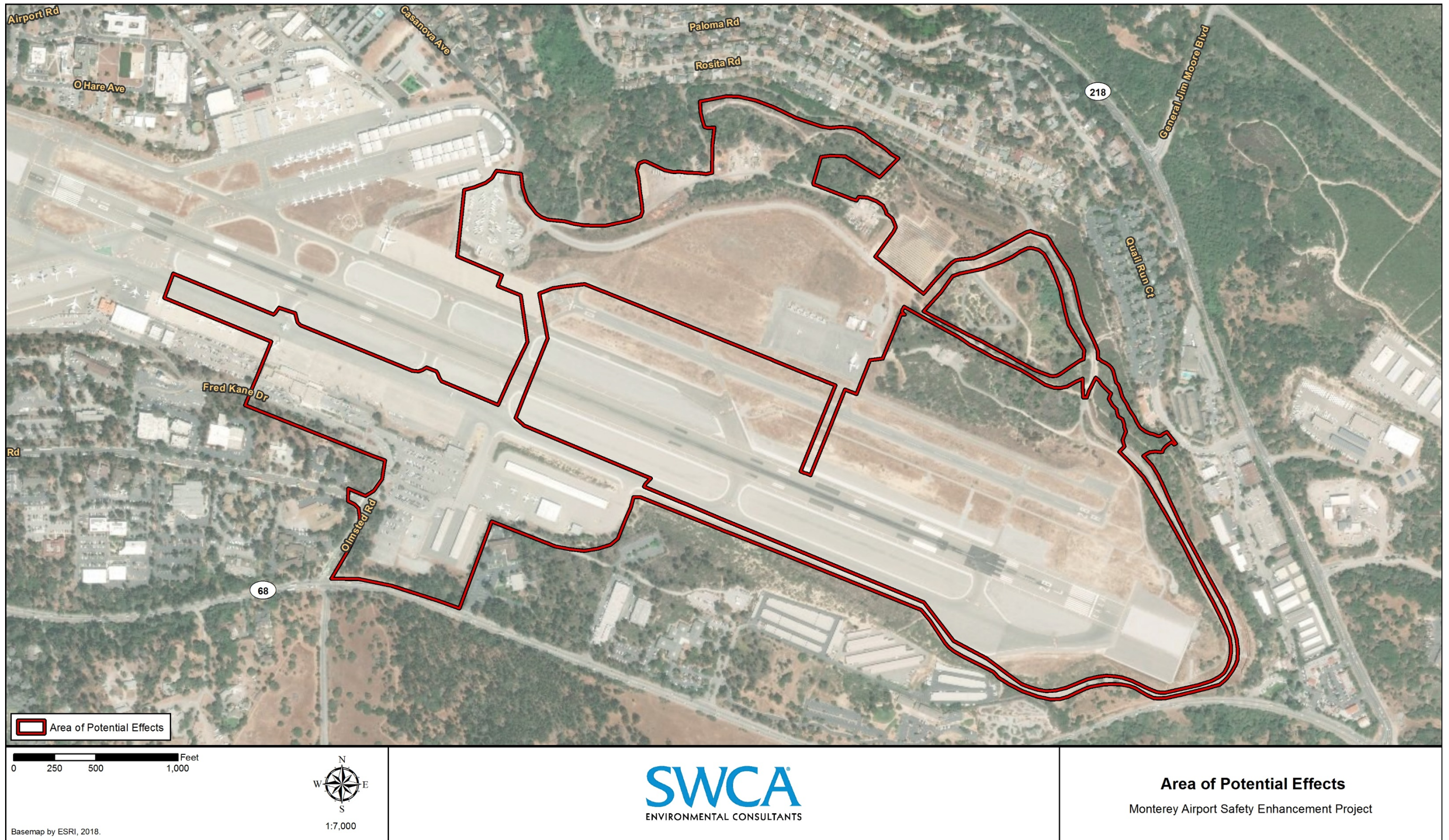
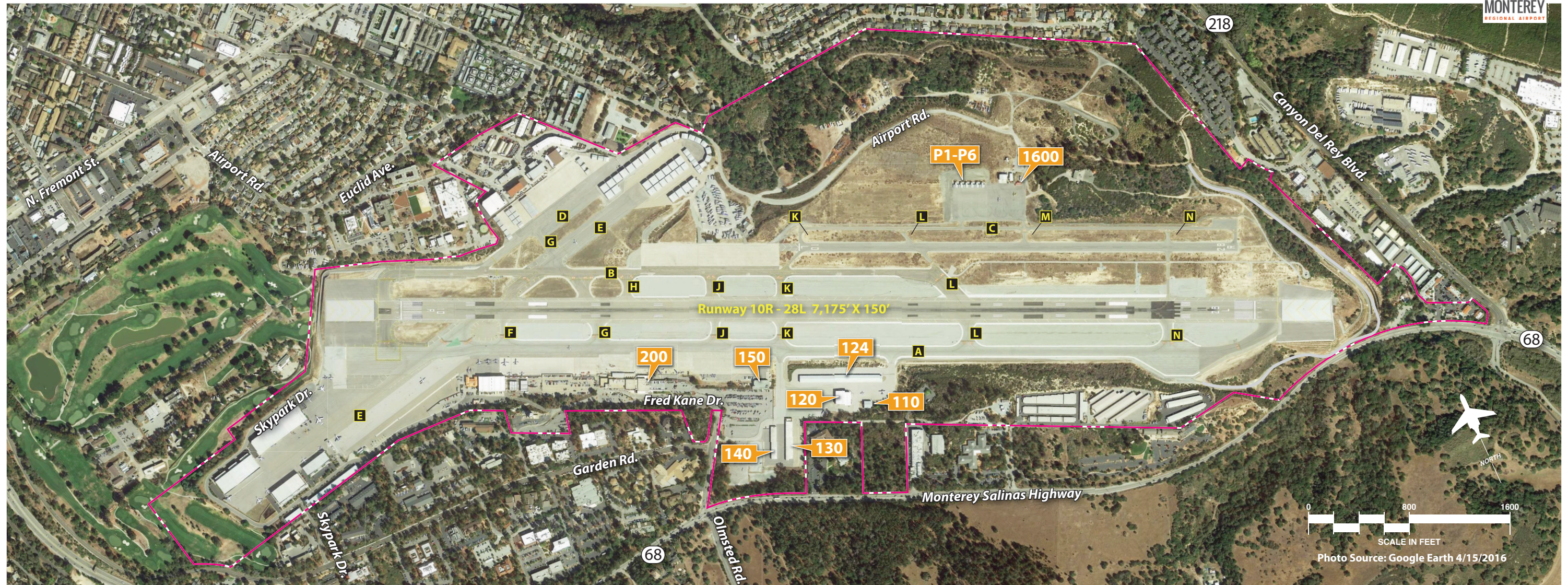


Figure 1. Area of Potential Effects Map.





**LEGEND**

- Airport Property Line
- Taxiway Designator





**ATTACHMENT B**  
**Archaeological Monitoring Plan**

SWCA

Archaeological Monitoring Plan for  
the Airport Safety Enhancement  
Project for Taxiway A Relocation &  
Associated Building Relocations  
Project at Monterey Regional Airport,  
Monterey County, California

SEPTEMBER 2019

PREPARED FOR  
**Coffman Associates**

PREPARED BY  
**SWCA Environmental Consultants**

**ARCHAEOLOGICAL MONITORING PLAN FOR THE  
AIRPORT SAFETY ENHANCEMENT PROJECT FOR  
TAXIWAY A RELOCATION &  
ASSOCIATED BUILDING RELOCATIONS PROJECT AT  
MONTEREY REGIONAL AIRPORT,  
MONTEREY COUNTY, CALIFORNIA**

Prepared for

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SWCA Project No. 37212

September 2019



**Archaeological and other heritage resources can be damaged or destroyed through uncontrolled public disclosure of information regarding their location. This document contains sensitive information regarding the nature and location of archaeological sites, which should not be disclosed to the general public or unauthorized persons.**

**Information regarding the location, character, or ownership of a cultural resource is exempt from the Freedom of Information Act pursuant to 54 U.S.C. 307103 (National Historic Preservation Act) and 16 U.S.C. Section 470(h) (Archaeological Resources Protections Act).**

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# 1 INTRODUCTION

SWCA Environmental Consultants (SWCA) was retained by Coffman Associates to prepare an Archaeological Monitoring Plan (AMP) for the Airport Safety Enhancement Project for Taxiway A Relocation Associated Building Relocations at Monterey Regional Airport, Monterey County, California (Figure 1). The proposed Airport Safety Enhancement Project (Project) includes the following and would be phased over approximately 10 years:

- Relocate 44 general aviation (GA) hangars and a fuel tank from the southeast side of the airport to the north side of the airport.
- Add up to seven new GA hangars on the north side of the airport.
- Relocate the existing aircraft rescue and firefighting (ARFF) building and construct an ARFF service road.
- Relocate the commercial terminal and necessary apron pavement (and associated parking and roadway improvements).
- Close Taxiway K at its connection with the new commercial terminal apron.
- Implement a 52.5-foot southerly shift of 1,850 linear feet of Taxiway A and associated lighting, signage, and markings.
- Re-mark hold lines on Taxiway A at Taxiway Connectors G and J to a 250-foot separation from the Runway 10L-28R centerline.
- Install taxiway “islands” at Taxiway Connectors G and J.
- Construct replacement vehicular parking along Fred Kane Drive.

This AMP is intended to provide guidance and protocol for conducting archaeological monitoring in accordance with the mitigation measures outlined in the project’s Environmental Assessment. For a complete review of the environmental and cultural setting please see the *Cultural Resources Survey Report for the Monterey Regional Airport* (SWCA 2018).

## 1.1 List of Key Personnel

A qualified archeological team will be retained and identified at a later date.

# 2 FIELD METHODS

The archaeological monitor(s) will observe all ground-disturbing activities within areas of dense vegetation that have not been subject to prior extensive disturbance (Figure 1). The monitor will observe excavation equipment in progress and examine excavated sediments and excavation sidewalls for evidence of intact archaeological features, artifact concentrations, human remains, or unique isolated finds. The archaeological monitor(s) may screen portions of the excavated soils in order to assist in the characterization of the integrity of the subsurface deposit, or in the event of potentially significant and/or concentrated artifactual discovery. The monitor will take photographs of each excavation location and produce detailed sketch maps of certain excavation sidewall profiles.

## **2.1 Native American Representation**

A representative from the Ohlone/Costanoan Esselen Nation (the Tribe), who will be retained by Monterey Regional Airport (the Airport), will monitor alongside the consultant archaeological monitor (as needed). The duration of tribal monitoring may be dependent upon the type and extent of identified resources.

## **2.2 Frequency of Monitoring**

The consultant archaeologist, in coordination with the excavation contractor, the Tribe, and Airport staff, shall determine what project activities will be monitored by an archaeologist with the areas identified in Figure 1. In most cases, any ground-disturbing activities in native soil shall require archaeological monitoring because of the potential risk these activities pose to archaeological resources and to their depositional context. Construction activities occurring within previously disturbed soils exhibiting no evidence of archaeological resources may not warrant archaeological or tribal monitoring. An archaeological monitor and tribal monitor will be present during all activities deemed to be undertaken within areas that may expose archaeological resources. Archaeological and tribal monitoring will cease when it is determined that excavations within the identified sensitive areas for the project area are complete. Archaeological and tribal monitoring frequency may be scaled back to a spot-checking effort if it is determined by the archaeological monitor, in coordination with the Airport, that comprehensive monitoring is no longer required.

## **2.3 Archaeological Resource Sensitivity**

No new, significant cultural resources were identified within the project site as a result of pedestrian survey and archival research conducted by SWCA (2018). However, as with previous cultural resources studies conducted on the airport property, archaeological survey is problematic in this area due to dense vegetation cover and existing developments (e.g., runway and taxiways, buildings, roads). The Airport property is considered sensitive for the presence of both prehistoric and historic archaeological resources.

## **3 STOP WORK AUTHORITY AND CONTACT LIST**

The archaeological and tribal monitors will have “stop work” authority in the event of a potentially significant discovery. These situations include, but are not limited to, the discovery of:

- Intact archaeological deposits;
- Human remains, regardless of context;
- Intact surface (milling features) or subsurface features such as hearths, concentrations of artifacts (i.e., caches), concentrations of ash/charcoal or fire-affected rock, or compacted living surfaces;
- Potential funerary objects such as charmstones, pendants, certain bead types, and ceremonial tools;
- Unique or uncommon artifacts such as certain projectile point types, fishhooks, steatite artifacts, milling equipment, and bone tools; and
- Historic-era materials and/or subsurface features such as refuse deposits, ship remnants, foundations, building materials.



**Exact location of sensitive areas not disclosed to protect resource integrity.**

The archaeological and tribal monitors will be empowered to stop any project activity in the event of any potential discovery. It is entirely up to the discretion of the archaeological monitor on-site to determine when to stop work. If deemed necessary, project activities/equipment will cease within 50 feet of the find, and, if possible, be redirected to another portion of the project. The monitor will then contact the consultant archaeologist and the Airport to discuss the find and the potential course(s) of action. The archaeological monitor will retain a log of all identified contacts and the information will be included, as needed, in the daily monitoring logs.

### **3.1 Human Remains**

The discovery of human remains during the course of the project is a possibility. If human remains are encountered, then the procedures outlined by the Native American Heritage Commission (NAHC), in accordance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, will be followed. If the monitor determines that a discovery includes human remains:

1. All ground-disturbing work within the immediate vicinity of the find (50 feet) will halt.
2. The archaeologist will contact the Monterey County Coroner:

Monterey County Sherriff's Department  
1414 Natividad Road  
Salinas, CA 93906  
Phone: (831) 647-7792  
Web: <https://www.montereysheriff.org/sheriff-coroner/>

3. As a courtesy, the archaeologist would also notify the NAHC:

Native American Heritage Commission  
915 Capitol Mall, Room 364  
Sacramento, California 95814  
Phone: (916) 373-3710  
Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)

The Monterey County Coroner will have 2 working days to examine the remains after being notified in accordance with Health and Safety Code Section 7050.5. If the coroner determines that the remains are Native American and are not subject to the coroner's authority, the coroner has 24 hours to notify the NAHC of the discovery. The NAHC will immediately designate and notify the Native American Most Likely Descendant (MLD), who will have 48 hours after being granted access to the location of the remains to inspect them and make recommendations for treatment.

## **4 MONITORING REPORTING PROCEDURES**

At the conclusion of each workday, the archaeological monitor will complete a Daily Monitoring Log that will document the day's activities and discoveries, if any. Depending on the duration of project activities that require monitoring, the archaeological monitor may also provide a weekly summary report (via email) that will include information regarding locations monitored or surveyed, what type of construction activities were observed, and whether or not any potentially significant finds were identified. Upon completion of the archaeological monitoring, the consultant archaeologist will prepare a brief report summarizing the results of the fieldwork. The report will include figures and photographs, as necessary. The report will be provided to the Airport for submittal to the project's Environmental Coordinator, indicating that the archaeological monitoring conditions for the project have been met.

## 5 REFERENCES

SWCA Environmental Consultants

- 2018 *Cultural Resources Survey Report for the Monterey Regional Airport*. Submitted to Monterey Regional Airport and the Northwest Information Center. On file with Monterey Regional Airport and SWCA.

SWCA

CULTURAL RESOURCES SURVEY REPORT  
FOR THE MONTEREY REGIONAL AIRPORT,  
MONTEREY COUNTY, CALIFORNIA

OCTOBER 2018

NOTE: The full report is not included in this public review document  
as it includes confidential information regarding the location of  
archaeological sites.

PREPARED FOR  
**Coffman Associates**

PREPARED BY  
**SWCA Environmental Consultants**



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Airports Division

**RECEIVED**

DEC 06 2019

**MONTEREY PENINSULA  
AIRPORT DISTRICT**

San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

November 29, 2019

Ms. Karen White  
Chairperson  
P.O. Box 7045  
Spreckels, CA 93962

Subject: Monterey Peninsula Airport District, Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California

Dear Chairperson White:

The Federal Aviation Administration (FAA) and the Monterey Peninsula Airport District (MPAD) are preparing an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) evaluating the potential impacts resulting from the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California. The FAA is the lead federal agency for Native American consultation for the proposed project. The MPAD is the sponsor for Monterey Regional Airport.

#### Consultation Initiation

With this letter, the FAA is seeking input on concerns that uniquely or significantly affect your Tribe related to planned and proposed airport improvements. Early identification of Tribal concerns will allow the FAA to consider ways to avoid and minimize potential impacts to Tribal resources and practices as project planning and alternatives are refined.

#### Project Information

The overall purpose of the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations is to increase the separation distance between Runway 10R-28L and parallel Taxiway A to enhance safety at Monterey Regional Airport. However, in order to complete that action, a number of other steps, including demolishing and replacing the existing passenger terminal are required. Therefore, the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations includes the following items and actions:

- Increase the centerline to centerline separation distance between Runway (RW) 10R-28L and the adjacent parallel Taxiway (TW) "A" to a uniform separation distance of 327.5 feet.
- Provide apron islands for TWs "G" and "J" at their connections with TW "A" to prevent direct access from the adjacent apron to RW 10L-28R.



- Relocate existing hold lines on TW “A” at TWs “G” and “J” 50 feet farther from the centerline of RW 10R-28L to a 250 foot distance from the centerline of RW 10R-28L.
- Demolish the existing approximately 70,000-square-foot (sf) passenger terminal building, which includes five boarding gates. Replace the building with an approximately 100,000-sf terminal building with five boarding gates.
- Construct new vehicle parking lots south and east of the new passenger terminal.
- Close TW “K” so that there will be no direct access via TW “K” from the relocated terminal aircraft parking apron to RW 10R-28L.
- Remove the existing three-acre southeast general aviation (GA) apron and hangar area and relocate approximately 44 GA tenants to the northeast side of the Airport.
- Demolish the existing aircraft rescue and firefighting (ARFF) building and construct a new ARFF building on the north GA apron.
- Consider and possibly construct an additional “north side” road to provide access to the northeast side of the Airport.
- Provide areas on north side of the Airport for stockpiling or depositing excess cut material created by the Proposed Action.

The Proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations for Monterey Regional Airport, is shown on the following exhibits:

- Exhibit 1A – Vicinity/Location Map
- Exhibit 1B – Existing Facilities
- Exhibit 1C – Proposed Project Phasing
- Exhibit 2B – “North Side” Road Alternatives
- Exhibit 1H – Proposed Haul Routes and Material Stockpile/Disposal Areas

#### Confidentiality

We understand that you may have concerns about the confidentiality of information on areas or resources of religious, traditional and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

#### FAA Contact Information

Your timely response within 30 days of receipt of this correspondence will greatly assist us in incorporating your concerns into project planning. If you want to provide comments related to this proposed project, please contact Mr. Doug Pomeroy, Environmental Protection Specialist at the letterhead address above, or by telephone at 650-827-7612, or by e-mail at [douglas.pomeroy@faa.gov](mailto:douglas.pomeroy@faa.gov).

You may also contact me directly at 650-827-7600 or [laurie.suttmeier@faa.gov](mailto:laurie.suttmeier@faa.gov).

Sincerely,

*Original signed by Douglas Pomeroy, Acting Manager, for*

Laurie J. Suttmeier  
Manager, Airports District Office

Enclosures:

- cc: (w/o enclosures)  
Chris Morello, Deputy Director of Strategy and Development, Monterey Regional Airport



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Airports Division

San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

November 29, 2019

Mr. Fredrick Segobia  
Tribal Representative  
Salinan Tribe of Monterey, San Luis Obispo Counties  
7070 Morro Road, Suite A  
Atascadero, CA 93422

Subject: Monterey Peninsula Airport District, Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California

Dear Mr. Segobia:

The Federal Aviation Administration (FAA) and the Monterey Peninsula Airport District (MPAD) are preparing an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) evaluating the potential impacts resulting from the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California. The FAA is the lead federal agency for Native American consultation for the proposed project. The MPAD is the sponsor for Monterey Regional Airport.

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#### Project Information

The overall purpose of the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations is to increase the separation distance between Runway 10R-28L and parallel Taxiway A to enhance safety at Monterey Regional Airport. However, in order to complete that action, a number of other steps, including demolishing and replacing the existing passenger terminal are required. Therefore, the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations includes the following items and actions:

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- Relocate existing hold lines on TW “A” at TWs “G” and “J” 50 feet farther from the centerline of RW 10R-28L to a 250 foot distance from the centerline of RW 10R-28L.
- Demolish the existing approximately 70,000-square-foot (sf) passenger terminal building, which includes five boarding gates. Replace the building with an approximately 100,000-sf terminal building with five boarding gates.
- Construct new vehicle parking lots south and east of the new passenger terminal.
- Close TW “K” so that there will be no direct access via TW “K” from the relocated terminal aircraft parking apron to RW 10R-28L.
- Remove the existing three-acre southeast general aviation (GA) apron and hangar area and relocate approximately 44 GA tenants to the northeast side of the Airport.
- Demolish the existing aircraft rescue and firefighting (ARFF) building and construct a new ARFF building on the north GA apron.
- Consider and possibly construct an additional “north side” road to provide access to the northeast side of the Airport.
- Provide areas on north side of the Airport for stockpiling or depositing excess cut material created by the Proposed Action.

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You may also contact me directly at 650-827-7600 or [laurie.suttmeier@faa.gov](mailto:laurie.suttmeier@faa.gov).

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*Original signed by Douglas Pomeroy, Acting Manager, for*

Laurie J. Suttmeier  
Manager, Airports District Office

Enclosures:

- cc: (w/o enclosures)  
Chris Morello, Deputy Director of Strategy and Development, Monterey Regional Airport





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Airports Division

San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

November 29, 2019

Mr. Tom Little Bear Nason  
Chairman  
Esselen Tribe of Monterey County  
P.O. Box 95  
Carmel Valley, California 93924

Subject: Monterey Peninsula Airport District, Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California

Dear Chairperson Nason:

The Federal Aviation Administration (FAA) and the Monterey Peninsula Airport District (MPAD) are preparing an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) evaluating the potential impacts resulting from the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California. The FAA is the lead federal agency for Native American consultation for the proposed project. The MPAD is the sponsor for Monterey Regional Airport.

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- Relocate existing hold lines on TW “A” at TWs “G” and “J” 50 feet farther from the centerline of RW 10R-28L to a 250 foot distance from the centerline of RW 10R-28L.
- Demolish the existing approximately 70,000-square-foot (sf) passenger terminal building, which includes five boarding gates. Replace the building with an approximately 100,000-sf terminal building with five boarding gates.
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Sincerely,

*Original signed by Douglas Pomeroy, Acting Manager, for*

Laurie J. Suttmeier  
Manager, Airports District Office

Enclosures:

- cc: (w/o enclosures)  
Chris Morello, Deputy Director of Strategy and Development, Monterey Regional Airport





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San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

November 29, 2019

Mr. Tony Cerda  
Chairperson  
Costanoan Rumsen Carmel Tribe  
244 E. 1<sup>st</sup> Street  
Pomona, California 91766

Subject: Monterey Peninsula Airport District, Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California

Dear Chairperson Cerda:

The Federal Aviation Administration (FAA) and the Monterey Peninsula Airport District (MPAD) are preparing an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) evaluating the potential impacts resulting from the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California. The FAA is the lead federal agency for Native American consultation for the proposed project. The MPAD is the sponsor for Monterey Regional Airport.

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You may also contact me directly at 650-827-7600 or [laurie.suttmeier@faa.gov](mailto:laurie.suttmeier@faa.gov).

Sincerely,

*Original signed by Douglas Pomeroy, Acting Manager, for*

Laurie J. Suttmeier  
Manager, Airports District Office

Enclosures:

- cc: (w/o enclosures)  
Chris Morello, Deputy Director of Strategy and Development, Monterey Regional Airport



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**Federal Aviation  
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Western-Pacific Region  
Airports Division

San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

November 29, 2019

Ms. Irenne Zwierlein  
Chairperson  
Amah Mutsun Tribal Band of Mission San Juan Bautista  
789 Canada Road  
Woodside, California 94062

Subject: Monterey Peninsula Airport District, Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California

Dear Chairperson Zwierlein:

The Federal Aviation Administration (FAA) and the Monterey Peninsula Airport District (MPAD) are preparing an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) evaluating the potential impacts resulting from the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California. The FAA is the lead federal agency for Native American consultation for the proposed project. The MPAD is the sponsor for Monterey Regional Airport.

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#### Project Information

The overall purpose of the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations is to increase the separation distance between Runway 10R-28L and parallel Taxiway A to enhance safety at Monterey Regional Airport. However, in order to complete that action, a number of other steps, including demolishing and replacing the existing passenger terminal are required. Therefore, the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations includes the following items and actions:

- Increase the centerline to centerline separation distance between Runway (RW) 10R-28L and the adjacent parallel Taxiway (TW) "A" to a uniform separation distance of 327.5 feet.
- Provide apron islands for TWs "G" and "J" at their connections with TW "A" to prevent direct access from the adjacent apron to RW 10L-28R.

- Relocate existing hold lines on TW “A” at TWs “G” and “J” 50 feet farther from the centerline of RW 10R-28L to a 250 foot distance from the centerline of RW 10R-28L.
- Demolish the existing approximately 70,000-square-foot (sf) passenger terminal building, which includes five boarding gates. Replace the building with an approximately 100,000-sf terminal building with five boarding gates.
- Construct new vehicle parking lots south and east of the new passenger terminal.
- Close TW “K” so that there will be no direct access via TW “K” from the relocated terminal aircraft parking apron to RW 10R-28L.
- Remove the existing three-acre southeast general aviation (GA) apron and hangar area and relocate approximately 44 GA tenants to the northeast side of the Airport.
- Demolish the existing aircraft rescue and firefighting (ARFF) building and construct a new ARFF building on the north GA apron.
- Consider and possibly construct an additional “north side” road to provide access to the northeast side of the Airport.
- Provide areas on north side of the Airport for stockpiling or depositing excess cut material created by the Proposed Action.

The Proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations for Monterey Regional Airport, is shown on the following exhibits:

- Exhibit 1A – Vicinity/Location Map
- Exhibit 1B – Existing Facilities
- Exhibit 1C – Proposed Project Phasing
- Exhibit 2B – “North Side” Road Alternatives
- Exhibit 1H – Proposed Haul Routes and Material Stockpile/Disposal Areas

#### Confidentiality

We understand that you may have concerns about the confidentiality of information on areas or resources of religious, traditional and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

#### FAA Contact Information

Your timely response within 30 days of receipt of this correspondence will greatly assist us in incorporating your concerns into project planning. If you want to provide comments related to this proposed project, please contact Mr. Doug Pomeroy, Environmental Protection Specialist at the letterhead address above, or by telephone at 650-827-7612, or by e-mail at [douglas.pomeroy@faa.gov](mailto:douglas.pomeroy@faa.gov).

You may also contact me directly at 650-827-7600 or [laurie.suttmeier@faa.gov](mailto:laurie.suttmeier@faa.gov).

Sincerely,

*Original signed by Douglas Pomeroy, Acting Manager, for*

Laurie J. Suttmeier  
Manager, Airports District Office

Enclosures:

- cc: (w/o enclosures)  
Chris Morello, Deputy Director of Strategy and Development, Monterey Regional Airport





U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Airports Division

San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

November 29, 2019

Ms. Ann Marie Sayers  
Chairperson  
Indian Canyon Mutsun Band of Costanoan  
P.O. Box 28  
Hollister, California 95024

Subject: Monterey Peninsula Airport District, Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California

Dear Chairperson Sayers:

The Federal Aviation Administration (FAA) and the Monterey Peninsula Airport District (MPAD) are preparing an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) evaluating the potential impacts resulting from the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California. The FAA is the lead federal agency for Native American consultation for the proposed project. The MPAD is the sponsor for Monterey Regional Airport.

#### Consultation Initiation

With this letter, the FAA is seeking input on concerns that uniquely or significantly affect your Tribe related to planned and proposed airport improvements. Early identification of Tribal concerns will allow the FAA to consider ways to avoid and minimize potential impacts to Tribal resources and practices as project planning and alternatives are refined.

#### Project Information

The overall purpose of the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations is to increase the separation distance between Runway 10R-28L and parallel Taxiway A to enhance safety at Monterey Regional Airport. However, in order to complete that action, a number of other steps, including demolishing and replacing the existing passenger terminal are required. Therefore, the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations includes the following items and actions:

- Increase the centerline to centerline separation distance between Runway (RW) 10R-28L and the adjacent parallel Taxiway (TW) "A" to a uniform separation distance of 327.5 feet.
- Provide apron islands for TWs "G" and "J" at their connections with TW "A" to prevent direct access from the adjacent apron to RW 10L-28R.



- Relocate existing hold lines on TW “A” at TWs “G” and “J” 50 feet farther from the centerline of RW 10R-28L to a 250 foot distance from the centerline of RW 10R-28L.
- Demolish the existing approximately 70,000-square-foot (sf) passenger terminal building, which includes five boarding gates. Replace the building with an approximately 100,000-sf terminal building with five boarding gates.
- Construct new vehicle parking lots south and east of the new passenger terminal.
- Close TW “K” so that there will be no direct access via TW “K” from the relocated terminal aircraft parking apron to RW 10R-28L.
- Remove the existing three-acre southeast general aviation (GA) apron and hangar area and relocate approximately 44 GA tenants to the northeast side of the Airport.
- Demolish the existing aircraft rescue and firefighting (ARFF) building and construct a new ARFF building on the north GA apron.
- Consider and possibly construct an additional “north side” road to provide access to the northeast side of the Airport.
- Provide areas on north side of the Airport for stockpiling or depositing excess cut material created by the Proposed Action.

The Proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations for Monterey Regional Airport, is shown on the following exhibits:

- Exhibit 1A – Vicinity/Location Map
- Exhibit 1B – Existing Facilities
- Exhibit 1C – Proposed Project Phasing
- Exhibit 2B – “North Side” Road Alternatives
- Exhibit 1H – Proposed Haul Routes and Material Stockpile/Disposal Areas

#### Confidentiality

We understand that you may have concerns about the confidentiality of information on areas or resources of religious, traditional and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

#### FAA Contact Information

Your timely response within 30 days of receipt of this correspondence will greatly assist us in incorporating your concerns into project planning. If you want to provide comments related to this proposed project, please contact Mr. Doug Pomeroy, Environmental Protection Specialist at the letterhead address above, or by telephone at 650-827-7612, or by e-mail at [douglas.pomeroy@faa.gov](mailto:douglas.pomeroy@faa.gov).

You may also contact me directly at 650-827-7600 or [laurie.suttmeier@faa.gov](mailto:laurie.suttmeier@faa.gov).

Sincerely,

*Original signed by Douglas Pomeroy, Acting Manager, for*

Laurie J. Suttmeier  
Manager, Airports District Office

Enclosures:

- cc: (w/o enclosures)  
Chris Morello, Deputy Director of Strategy and Development, Monterey Regional Airport



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Airports Division

San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

November 29, 2019

Ms. Louise Miranda-Ramirez  
Chairperson  
Ohlone/Costanoan-Esselen Nation  
P.O. Box 1301  
Monterey, California 93942

Subject: Monterey Peninsula Airport District, Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California

Dear Chairperson Miranda-Ramirez:

The Federal Aviation Administration (FAA) and the Monterey Peninsula Airport District (MPAD) are preparing an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) evaluating the potential impacts resulting from the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California. The FAA is the lead federal agency for Native American consultation for the proposed project. The MPAD is the sponsor for Monterey Regional Airport.

#### Consultation Initiation

With this letter, the FAA is seeking input on concerns that uniquely or significantly affect your Tribe related to planned and proposed airport improvements. Early identification of Tribal concerns will allow the FAA to consider ways to avoid and minimize potential impacts to Tribal resources and practices as project planning and alternatives are refined.

#### Project Information

The overall purpose of the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations is to increase the separation distance between Runway 10R-28L and parallel Taxiway A to enhance safety at Monterey Regional Airport. However, in order to complete that action, a number of other steps, including demolishing and replacing the existing passenger terminal are required. Therefore, the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations includes the following items and actions:

- Increase the centerline to centerline separation distance between Runway (RW) 10R-28L and the adjacent parallel Taxiway (TW) "A" to a uniform separation distance of 327.5 feet.
- Provide apron islands for TWs "G" and "J" at their connections with TW "A" to prevent direct access from the adjacent apron to RW 10L-28R.



- Relocate existing hold lines on TW “A” at TWs “G” and “J” 50 feet farther from the centerline of RW 10R-28L to a 250 foot distance from the centerline of RW 10R-28L.
- Demolish the existing approximately 70,000-square-foot (sf) passenger terminal building, which includes five boarding gates. Replace the building with an approximately 100,000-sf terminal building with five boarding gates.
- Construct new vehicle parking lots south and east of the new passenger terminal.
- Close TW “K” so that there will be no direct access via TW “K” from the relocated terminal aircraft parking apron to RW 10R-28L.
- Remove the existing three-acre southeast general aviation (GA) apron and hangar area and relocate approximately 44 GA tenants to the northeast side of the Airport.
- Demolish the existing aircraft rescue and firefighting (ARFF) building and construct a new ARFF building on the north GA apron.
- Consider and possibly construct an additional “north side” road to provide access to the northeast side of the Airport.
- Provide areas on north side of the Airport for stockpiling or depositing excess cut material created by the Proposed Action.

The Proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations for Monterey Regional Airport, is shown on the following exhibits:

- Exhibit 1A – Vicinity/Location Map
- Exhibit 1B – Existing Facilities
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- Exhibit 1H – Proposed Haul Routes and Material Stockpile/Disposal Areas

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We understand that you may have concerns about the confidentiality of information on areas or resources of religious, traditional and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

#### FAA Contact Information

Your timely response within 30 days of receipt of this correspondence will greatly assist us in incorporating your concerns into project planning. If you want to provide comments related to this proposed project, please contact Mr. Doug Pomeroy, Environmental Protection Specialist at the letterhead address above, or by telephone at 650-827-7612, or by e-mail at [douglas.pomeroy@faa.gov](mailto:douglas.pomeroy@faa.gov).

You may also contact me directly at 650-827-7600 or [laurie.suttmeier@faa.gov](mailto:laurie.suttmeier@faa.gov).

Sincerely,

*Original signed by Douglas Pomeroy, Acting Manager, for*

Laurie J. Suttmeier  
Manager, Airports District Office

Enclosures:

- cc: (w/o enclosures)  
Chris Morello, Deputy Director of Strategy and Development, Monterey Regional Airport



*Ohlone/Costanoan-Esselen Nation*



*Previously acknowledged as  
The San Carlos Band of Mission Indians  
The Monterey Band  
And known as  
O.C.E.N. or Esselen Nation  
P.O. Box 1301  
Monterey, CA 93942*

[www.ohlonecostanoanesselenation.org](http://www.ohlonecostanoanesselenation.org)

January 16, 2020

U. S. Department of Transportation  
Federal Aviation Administration  
San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

Re: Monterey Peninsula Airport District, Proposed Airfield Safety Enhancement Project for Taxiway "A"  
Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California

Saleki Atsa,

Ohlone/Costanoan-Esselen Nation is an historically documented previously recognized tribe. OCEN is the legal tribal government representative for over 600 enrolled members of Esselen, Carmeleno, Monterey Band, Rumsen, Chalon, Soledad Mission, San Carlos Mission and/or Costanoan Mission Indian descent of Monterey County. Though other indigenous people may have lived in the area, the area is the indigenous homeland of our people. Included with this letter please find a territorial map by Taylor 1856; Levy 1973; and Milliken 1990, identifying Tribal areas.

**OCEN TRIBAL GOVERNMENT REQUEST AB52/SB18 CONSULTATION WITH THE LEAD AGENCIES.**

Sincerely and Respectfully Yours,

A handwritten signature in cursive script that reads "Louise J. Miranda Ramirez".

Louise J. Miranda Ramirez  
Tribal Chairwoman  
Ohlone/Costanoan-Esselen Nation  
(408) 629-5189

Cc: OCEN Tribal Council

Distribution of Ohlone/Costanoan-Esselen Nation Tribal Rancherías, Districts, Landgrants and Historic Landmarks

OCEN DIRECT LINEAL DESCENT

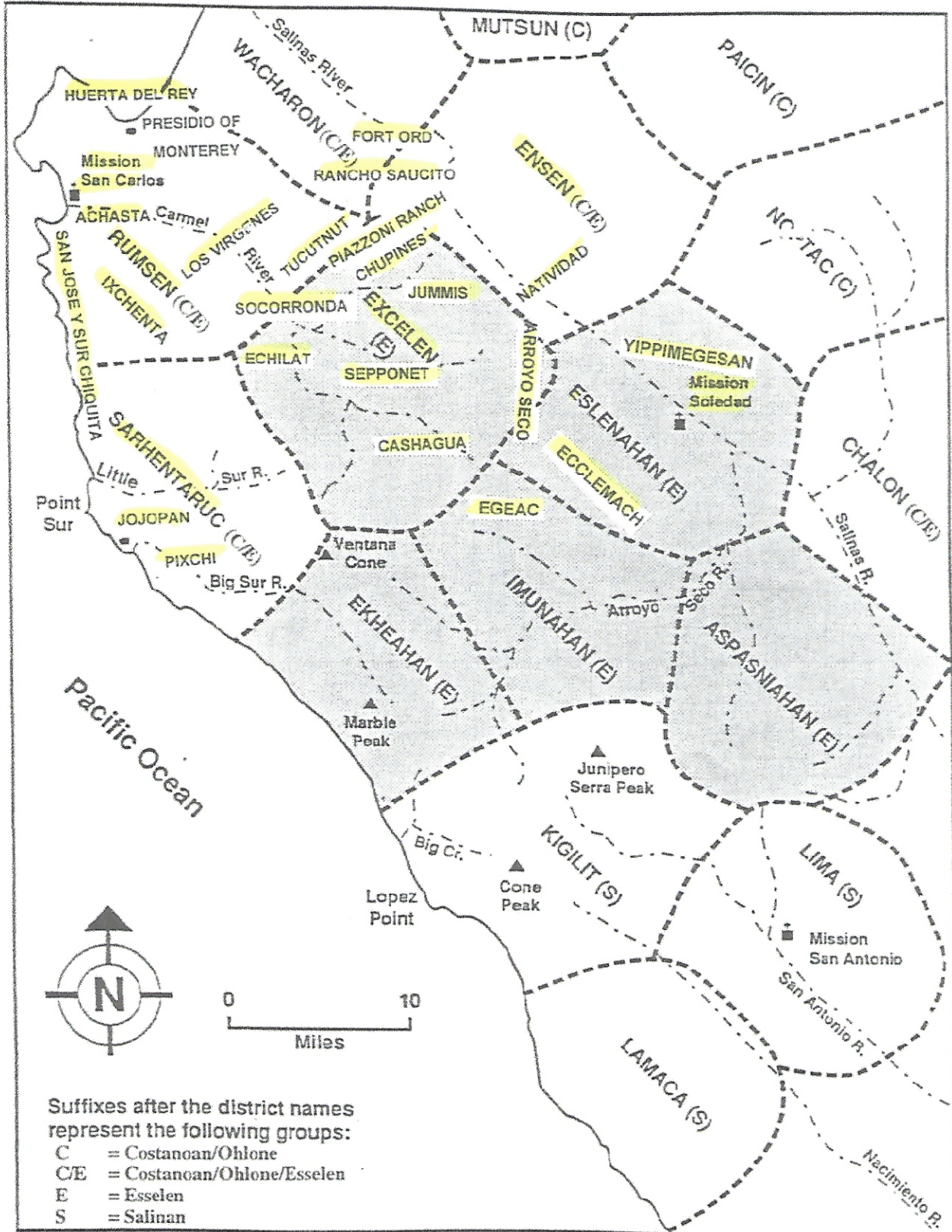


Figure 2:

Map after Taylor 1856; Levy 1973; Hester 1978; Milliken 1990



February 21, 2020

Ms. Louise Miranda-Ramirez  
Chairperson  
Ohlone/Costanoan-Esselen Nation  
P.O. Box 1301  
Monterey, California 93942

**Subject: Monterey Peninsula Airport District, Proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California**

Dear Chairperson Miranda-Ramirez:

The Federal Aviation Administration (FAA) has received your January 16, 2020 letter regarding the Monterey Peninsula Airport District (MPAD), Proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations (Taxiway “A” Project) for Monterey Regional Airport (MRY), Monterey, California. Your letter stated that MRY is within the indigenous homeland of your tribe, and you requested tribal government consultation under California State law AB52/SB18.

The FAA initiated consultation by letter of February 19, 2020, with the California State Historic Preservation Officer (SHPO) in accordance with the National Historic Preservation Act, Section 106, for the Taxiway “A” Project. There are no known archaeological sites on or eligible for the National Register of Historic Places (NRHP) within the Area of Potential Effect (APE) for the proposed project, and the only historic building within the APE - Tarp’s Roadhouse/Ryan House - would not be adversely affected by the project. Therefore, the FAA has concluded the Taxiway “A” Project would not adversely affect historic resources. A copy of that consultation letter and supporting documentation is attached.

Although the cultural resources evaluation of archaeological resources for the Taxiway “A” Project concluded that there were no resources on or eligible for the NRHP within the APE, the evaluation concluded that when vegetated areas are cleared, or soil is excavated, that previously undetected archaeological resources may be located. Therefore, the September 30, 2019 Technical Memorandum evaluating the effects of the Taxiway “A” Project on historic properties identified protective mitigation measures, and included an Archaeological Monitoring Plan. The MPAD February 13, 2020 letter to the FAA stated the MPAD intends to implement to measures in the Archaeological Monitoring Plan including retaining a representative of your tribe to be present with a professional consultant archaeologist to monitor areas when dense vegetation is removed, and ground-disturbing activities in native soils, where undisturbed archaeological resources may be present. The Technical

Memorandum, MPAD February 13, 2020 letter, and Archaeological Monitoring Plan are all attachments to the FAA February 19, 2020, letter to the California SHPO, which is attached to this letter. Please note that the cultural resources survey report attached to this letter includes information regarding the location of archaeological resources that should be considered confidential and not distributed to the general public.

Please review this letter and advise myself, or Mr. Douglas Pomeroy, Environmental Protection Specialist of my staff, within 30 days of receipt of this letter if you desire further consultations with the FAA regarding this project. We would also appreciate notification from you if you consider the mitigation and monitoring measures identified for the Taxiway "A" Project as sufficient to address concerns of your tribe regarding potential unanticipated discoveries of archaeological resources located within the project APE.

As the FAA is a Federal agency, we consult with tribal entities in accordance with federal requirements rather than California state law such as AB52/SB18. However, we are advising the MPAD of your request for consultation under California state law AB52/SB18. So far, the MPAD has advised us that the Taxiway "A" Project components were part of the MRY Airport Master Plan, for which the MPAD previously completed an AB52/SB18 consultation with you.

The MPAD is preparing a National Environmental Policy Act (NEPA), Environmental Assessment (EA) for public review and subsequent consideration by the FAA regarding the proposed Taxiway "A" Project. The EA document will be circulated for public review soon, and a copy will be provided to you for your review and comment. Sensitive archaeological information will not be included in the EA circulated for public review.

#### FAA Contact Information

Your timely response within 30 days of receipt of this correspondence will greatly assist us in incorporating your concerns into this project. If you want to provide comments to the FAA related to this proposed project, please contact Mr. Douglas Pomeroy, Environmental Protection Specialist at the letterhead address above, or by telephone at 650-827-7612, or by e-mail at [douglas.pomeroy@faa.gov](mailto:douglas.pomeroy@faa.gov). You may also contact me directly at the letterhead address, telephone at 650-827-7600 or e-mail at [laurie.suttmeier@faa.gov](mailto:laurie.suttmeier@faa.gov). Please note that Mr. Pomeroy is currently scheduled to be out of the office from March 9 through March 27.

Sincerely,

*Original signed by*

Laurie J. Suttmeier  
Manager, Airports District Office

Attachments:

Copy to: Chris Morello, Deputy Director of Strategy and Development, Monterey Regional Airport. w/o attachment





February 21, 2020

Mr. Fredrick Segobia  
Tribal Representative  
Salinan Tribe of Monterey, San Luis Obispo Counties  
7070 Morro Road, Suite A  
Atascadero, CA 93422

**Subject: Monterey Peninsula Airport District, Proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations for Monterey Regional Airport, Monterey, California**

Dear Mr. Segobia:

Our office previously advised you by letter of November 29, 2019, of the Monterey Peninsula Airport District (MPAD), Proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations (Taxiway “A” Project) for Monterey Regional Airport (MRY), Monterey, California. You subsequently contacted Mr. Douglas Pomeroy, Environmental Protection Specialist, of my staff, on February 7, 2020 to discuss the Taxiway “A” Project. Based on that conversation, we are providing you additional information regarding the Taxiway “A” Project.

The FAA initiated consultation by letter of February 19, 2020, with the California State Historic Preservation Officer (SHPO) in accordance with the National Historic Preservation Act, Section 106, for the Taxiway “A” Project. There are no known archaeological sites on or eligible for the National Register of Historic Places (NRHP) within the Area of Potential Effect (APE) for the proposed project, and the only historic building within the APE - Tarpy’s Roadhouse/Ryan House - would not be adversely affected by the project. Therefore, the FAA has concluded the Taxiway “A” Project would not adversely affect historic resources. A copy of that consultation letter and supporting documentation is attached.

Although the cultural resources evaluation of archaeological resources for the Taxiway “A” Project concluded that there were no resources on or eligible for the NRHP within the APE, the evaluation concluded that when vegetated areas are cleared, or soil is excavated, that previously undetected archaeological resources may be located. Therefore, the September 30, 2019 Technical Memorandum evaluating the effects of the Taxiway “A” Project on historic properties identified protective mitigation measures, and included an Archaeological Monitoring Plan. The MPAD February 13, 2020 letter to the FAA stated the MPAD intends to implement to measures in the Archaeological Monitoring Plan including retaining a professional consultant archaeologist to monitor areas when dense vegetation is removed, and ground-disturbing activities in native soils, where undisturbed archaeological resources

may be present. The Technical Memorandum, MPAD February 13, 2020 letter, and Archaeological Monitoring Plan are all attachments to the FAA February 19, 2020, letter to the California SHPO, which is attached to this letter.

As part of the Archaeological Monitoring Plan, the MPAD proposes to retain a tribal monitor to monitor areas when dense vegetation is removed, and ground-disturbing activities in native soils. Based on your conversation with Mr. Pomeroy, I understand that you are interested in having a Salinan tribal member monitor those activities along with the professional consultant archaeologist retained by the MPAD. Until your communication with Mr. Pomeroy, the FAA and MPAD were only aware of the interest of the Ohlone/Costanoan-Esselen Nation (OCEN) tribe in the archaeological monitoring. As a result, the Archaeological Monitoring Plan currently only addresses retaining a tribal representative of the OCEN to monitor the site along with the professional consultant archaeologist, as the OCEN had previously identified their interest in activities on MRY to the MPAD during development of the MRY Airport Master Plan.

The FAA will arrange a subsequent discussion among you, the MPAD, and the FAA, to discuss the possibility of the MPAD retaining a representative of your tribe as an additional tribal monitor for this proposed project. Mr. Pomeroy or I will contact you to schedule a consultation among your tribe, the FAA, and the MPAD regarding this subject. We will work with you and the MPAD to schedule a mutually agreeable time for this consultation, assuming your tribe would still like to have a member be retained as a tribal monitor for this activity.

Please review this letter and advise myself, or Mr. Pomeroy, within 30 days of receipt of this letter, if you desire further consultations with the FAA regarding being retained as a tribal monitor for this project. We would also appreciate notification from you if you identify other measures in addition to those described in the attached documentation to be appropriate protective measures for resources of concern to your tribe.

During your conversation with Mr. Pomeroy, you expressed interest in receiving a copy of the results of the archaeological data recovery effort associated with the prior 2014 MRY Runway Safety Area project. A compact disk copy of the 2016 report, *Data Recovery Report for Portions of CA-MNT-1438/H, Monterey Peninsula Airport District, Monterey, County*, prepared by Pacific Legacy Inc, is attached. The data recovery report and the cultural resources survey report attached to this letter include some information regarding the location of archaeological resources that should be considered confidential and not distributed to the general public.

The MPAD is preparing a National Environmental Policy Act (NEPA), Environmental Assessment (EA) for public review and subsequent consideration by the FAA regarding the proposed Taxiway "A" Relocation and Associated Building. The EA document will be circulated for public review soon, and a copy will be provided to you for your review and comment. Sensitive archaeological information will not be included in the EA circulated for public review.

FAA Contact Information

Your timely response within 30 days of receipt of this correspondence will greatly assist us in incorporating your concerns into this project. If you want to provide comments related to this proposed project, please contact Mr. Douglas Pomeroy, Environmental Protection Specialist, at the letterhead address above, or by telephone at 650-827-7612, or by e-mail at [douglas.pomeroy@faa.gov](mailto:douglas.pomeroy@faa.gov). Please note that Mr. Pomeroy is currently scheduled to be out of the office between March 9 and March 27 so you may also contact me directly at the letterhead address, telephone at 650-827-7600 or e-mail at [laurie.suttmeier@faa.gov](mailto:laurie.suttmeier@faa.gov).

Sincerely,

*Original signed by Alberto Cruz for*

Laurie J. Suttmeier  
Manager, Airports District Office

Attachments:

Copy to: Chris Morello, Deputy Director of Strategy and Development, Monterey Regional Airport. w/o attachment



Appendix F

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**NOTICE OF AVAILABILITY AND  
DRAFT ENVIRONMENTAL ASSESSMENT  
COMMENTS AND RESPONSES**



**APPENDIX F**

**NOTICE OF AVAILABILITY  
AND  
DRAFT ENVIRONMENTAL ASSESSMENT  
COMMENTS AND RESPONSES**

This appendix provides a record of the Draft Environmental Assessment (EA) agency and public review. It contains a list of notified agencies and stakeholders as well as affidavits of publication of newspaper legal notices. The Monterey Peninsula Airport District (MPAD or District) published a Notice of Availability (NOA) of the Draft EA for public review and comment on March 6, 2020, in the *Monterey Herald* and on the study website, with the public comment period scheduled to extend to April 6, 2020. An NOA with a link to the Draft EA was also sent to agencies and stakeholders notified during the initial public scoping period for the Final EA. However, on March 19, 2020, the Governor of California issued Executive Order N-33-20, a statewide stay-at-home order for California's residents, in response to the COVID-19 public health emergency in order to preserve public health and safety, and the City of Monterey and the City of Del Rey Oaks requested the comment period be extended. The District subsequently published a notice in the *Monterey Herald* on March 26, 2020, to extend the public comment period until April 20, 2020. The District, on April 6, 2020, further extended the public comment period until May 1, 2020.

During the public review and comment period, the Airport received comment letters from the following agencies and organizations:

- Salinan Tribe of Monterey and San Luis Obispo Counties
- Transportation Agency for Monterey County (TAMC)
- Monterey Peninsula Water Management District
- City of Del Rey Oaks
- City of Monterey
- United States (U.S.) Department of the Navy, Naval Support Activity Monterey
- The Highway 68 Coalition

The letter from the City of Monterey also included comments submitted by city residents and the Casanova Oak Knoll Neighborhood Association (CONA) as an attachment. In addition, the Airport received emails and comment letters from residents of the cities of Monterey and Del Rey Oaks.

Many of the emails and comment letters received address similar concerns. Therefore, these concerns are addressed in topical responses prior to the individual comments and responses. Utilization of the topical responses reduces the need for repetitive responses to common concerns and are referenced in the individual responses, as appropriate.



## PUBLIC NOTICE

### Notice of Availability of a Draft Environmental Assessment for the Proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation & Associated Building Relocations at Monterey Regional Airport

Pursuant to Title 49, United States Code, Section 47106(c)(1)(A), notice is hereby given that the Monterey Peninsula Airport District (District) proposes to seek Federal Aviation Administration (FAA) approval of the Airport Layout Plan for the Monterey Regional Airport and the use of federal funds for the proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation & Associated Building Relocations. The District is proposing the construction of a multi-phased safety enhancement project at the Airport including:

1. Increase the centerline to centerline separation distance between Runway (RW) 10R-28L and the adjacent parallel Taxiway (TW) “A” to a uniform separation distance of 327.5 feet for the entire length of TW “A” by relocating an approximately 1,850-linear-foot (lf) portion of TW “A” south by 52.5 feet. Currently, that 1,850 lf portion of Taxiway “A” is only 275 feet from the centerline of Runway 10R-28L.
2. Provide apron islands for TWs “G” and “J” at their connections with TW “A” to prevent direct access from the adjacent apron to RW 10L-28R.
3. Relocate existing hold lines on TW “A” at TWs “G” and “J” 50 feet farther from the centerline of RW 10R-28L so that hold lines that are currently 200 feet from the centerline of RW 10R-28L will then be 250 feet from the centerline of RW 10R-28L.
4. Demolish the existing approximately 70,000-square-foot (sf) passenger terminal building, constructed in 1950, and which includes five boarding gates, the 5.6-acre terminal aircraft parking apron located south of TW “A” between TW “G” and TW “J,” and an associated 576 automobile parking spaces (located east of Olmsted Road and north of Fred Kane Drive). Replace these facilities with an approximately 100,000-sf terminal building, located south of TW “A” between TW “J” and TW “K,” and an approximate 13.1-acre terminal aircraft parking apron. Construct new vehicle parking lots south and east of the new passenger terminal and apron (787 public and employee automobile parking spaces and 110 spaces for a rental car ready/return lot). This work is necessary to accommodate the relocation of Taxiway “A” and to provide additional automobile parking.
5. Close TW “K” so that there will be no direct access via TW “K” from the relocated terminal aircraft parking apron to RW 10R-28L.
6. Remove the existing three-acre southeast general aviation (GA) apron and hangar area, including approximately 126,000 sf of hangar space, and relocate approximately 44 GA tenants to the north side of the Airport. Replace the existing southeast GA apron and hangar area with the new passenger terminal complex and aircraft parking apron.
7. Construct approximately 205,000 sf of additional apron/taxilane pavement in the GA hangar area located north of Runway 10L-28R to allow the relocation of 44 GA tenants from the southeast side of the Airport. The hangar space removed on the southeast GA apron would be replaced with approximately 90,500 sf of T-hangar, box hangar, and executive hangar space, as well as buildable hangar pads that could accommodate an additional 35,500 sf of hangar space, and associated infrastructure for a total replacement of the 126,000 sf of GA facilities. Approximately 27 vehicular parking spaces would be provided in this area with a net increase in vehicular parking of seven spaces. The new apron would support GA activities by providing pavement, utilities, taxilanes, hangars and parking, fueling facilities, and a wash rack.
8. Concurrent with the site preparation for the north side GA area, build improvements on approximately 1,600 lf of airport vehicle service road from the existing east vehicle service road to the terminus of Airport Road at the north

Monterey Regional Airport  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940

Public Notice  
March 6, 2020  
Page 1 of 2

(831) 648-7000 **T**  
(831) 373-2625 **F**  
[www.montereyairport.com](http://www.montereyairport.com) **W**

- GA apron (northeast service road improvement) to provide a construction haul route for the Proposed Action and a service road to the north GA area from both sides of the Airport.
9. Demolish the existing aircraft rescue and firefighting (ARFF) building, which is located where the new passenger terminal apron will be constructed. Construct a new ARFF building on north GA apron and an on-airport ARFF service road to Runway 10R-28L.
  10. Provide areas on the north side of the Airport for stockpiling or depositing excess cut material created by the Proposed Action.

A Draft Environmental Assessment (EA) has been prepared to evaluate the potential environmental impacts of the proposed action and has been prepared pursuant to the requirements of Section 102(2)(c) of the *National Environmental Policy Act* (NEPA) and Section 509(b)(5) of the *Airport and Airway Improvement Act of 1982*, as amended. The FAA is the Lead Agency to ensure compliance with NEPA for airport development actions. The Draft EA was prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*. Pursuant to the federal *Clean Water Act*, *Clean Air Act*, *Endangered Species Act*, *National Historic Preservation Act*, and the *Department of Transportation Act*, the Draft EA includes an analysis of prudent or feasible alternatives, potential impacts, and mitigation measures, as appropriate.

Beginning **March 6, 2020**, a copy of the Draft EA will be available for review at <https://montereyairport.specialdistrict.org> or at the following locations during normal business hours:

- Monterey Regional Airport, 200 Fred Kane Drive, Suite 200, Monterey, CA 93940
- FAA San Francisco Airports District Office, 1000 Marina Boulevard, Suite 220, Brisbane, CA 94005-1835
- Monterey Public Library, 625 Pacific Street, Monterey, CA 93940
- Seaside Public Library, 550 Harcourt Street, Seaside, CA 93955

Any written comments on the Draft EA should be submitted to the following address:

**Monterey Regional Airport, 200 Fred Kane Drive, Suite 200, Monterey, CA 93940**  
**Attn: Chris Morello, Deputy Director of Strategy and Development**  
[planning@montereyairport.com](mailto:planning@montereyairport.com)

The cutoff date for comment submission is not later than **5:00 PM – Pacific Daylight Time, April 6, 2020**. Please allow enough time for mailing. All comments must be **received** by the deadline, not simply postmarked by that date.

Before including your name and telephone number, email, or other personal identifying information in your comment, be advised that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask FAA in your comment to withhold from public review your personal identifying information, FAA cannot guarantee that it will be able to do so.



# MONTEREY HERALD

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MONTEREY PENINSULA AIRPORT DISTRICT  
Account No. 2141463  
200 FRED KANE DR  
STE 200  
MONTEREY, CA 93940

Legal No. 0006466313  
Public Notice - Enhancement Project for Taxiway "A" Relocation

Ordered by: Chris Morello

## PROOF OF PUBLICATION

STATE OF CALIFORNIA  
County of Monterey

I am a citizen of the United States and a resident of the County aforesaid. I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of The Monterey Herald, a newspaper of general circulation, printed and published daily and Sunday in the City of Monterey, County of Monterey, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Monterey, State of California; that the notice, of which the annexed is a printed copy (set in type not smaller than 6 point), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

03/06/20

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Executed on 03/06/2020 at Monterey, California.

Signature

This space is reserved for the County Clerk's Filing Stamp

### Notice of Availability of a Draft Environmental Assessment for the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations at Monterey Regional Airport

Pursuant to Title 49, United States Code, Section 47106(c)(1)(A), notice is hereby given that the Monterey Peninsula Airport District (District) proposes to seek Federal Aviation Administration (FAA) approval of the Airport Layout Plan for the Monterey Regional Airport and the use of federal funds for the proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations. The District is proposing the construction of a multi-phased safety enhancement project at the Airport including:

1. Increase the centerline to centerline separation distance between Runway (RW) 10R-28L and the adjacent parallel Taxiway (TW) "A" to a uniform separation distance of 327.5 feet for the entire length of TW "A" by relocating an approximately 1,850-linear-foot (lf) portion of TW "A" south by 52.5 feet. Currently, that 1,850 lf portion of Taxiway "A" is only 275 feet from the centerline of Runway 10R-28L.
2. Provide apron islands for TWs "G" and "J" at their connections with TW "A" to prevent direct access from the adjacent apron to RW 10L-28R.
3. Relocate existing hold lines on TW "A" at TWs "G" and "J" 50 feet farther from the centerline of RW 10R-28L so that hold lines that are currently 200 feet from the centerline of RW 10R-28L will then be 250 feet from the centerline of RW 10R-28L.
4. Demolish the existing approximately 70,000-square-foot (sf) passenger terminal building, constructed in 1950, and which includes five boarding gates, the 5.6-acre terminal aircraft parking apron located south of TW "A" between TW "G" and TW "J," and an associated 576 automobile parking spaces (located east of Olmsted Road and north of Fred Kane Drive). Replace these facilities with an approximately 100,000-sf terminal building, located south of TW "A" between TW "J" and TW "K," and an approximate 13.1-acre terminal aircraft parking apron. Construct new vehicle parking lots south and east of the new passenger terminal and apron (787 public and employee automobile parking spaces and 110 spaces for a rental car ready/return lot). This work is necessary to accommodate the relocation of Taxiway "A" and to provide additional automobile parking.
5. Close TW "K" so that there will be no direct access via TW "K" from the relocated terminal aircraft parking apron to RW 10R-28L.
6. Remove the existing three-acre southeast general aviation (GA) apron and hangar area, including approximately 126,000 sf of hangar space, and relocate approximately 44 GA tenants to the north side of the Airport. Replace the existing southeast GA apron and hangar area with the new passenger terminal complex and aircraft parking apron.
7. Construct approximately 205,000 sf of additional apron/taxilane pavement in the GA hangar area located north of Runway 10L-28R to allow the relocation of 44 GA tenants from the southeast side of the Airport. The hangar space removed on the southeast GA apron would be replaced with approximately 90,500 sf of T-hangar, box hangar, and executive hangar space, as well as buildable hangar pads that could accommodate an additional 35,500 sf of hangar space, and associated infrastructure for a total replacement of the 126,000 sf of GA facilities. Approximately 27 vehicular parking spaces would be provided in this area with a net increase in vehicular parking of seven spaces. The new apron would support GA activities by providing pavement, utilities, taxilanes, hangars and parking, fueling facilities, and a wash rack.

8. Concurrent with the site preparation for the north side GA area, build improvements on approximately 1,600 lf of airport vehicle service road from the existing east vehicle service road to the terminus of Airport Road at the north GA apron (northeast service road improvement) to provide a construction haul route for the Proposed Action and a service road to the north GA area from both sides of the Airport.

9. Demolish the existing aircraft rescue and firefighting (ARFF) building, which is located where the new passenger terminal apron will be constructed. Construct a new ARFF building on north GA apron and an on-airport ARFF service road to Runway 10R-28L.

10. Provide areas on the north side of the Airport for stockpiling or depositing excess cut material created by the Proposed Action. A Draft Environmental Assessment (EA) has been prepared to evaluate the potential environmental impacts of the proposed action and has been prepared pursuant to the requirements of Section 102(2)(c) of the National Environmental Policy Act (NEPA) and Section 509(b)(5) of the Airport and Airway Improvement Act of 1982, as amended. The FAA is the Lead Agency to ensure compliance with NEPA for airport development actions. The Draft EA was prepared in accordance with FAA Order 1050.1F, Environmental Impacts: Policies and Procedures and FAA Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions. Pursuant to the federal Clean Water Act, Clean Air Act, Endangered Species Act, National Historic Preservation Act, and the Department of Transportation Act, the Draft EA includes an analysis of prudent or feasible alternatives, potential impacts, and mitigation measures, as appropriate.

Beginning **March 6, 2020**, a copy of the Draft EA will be available for review at <https://montereyairport.specialdistrict.org> or at the following locations during normal business hours:

- Monterey Regional Airport, 200 Fred Kane Drive, Suite 200, Monterey, CA 93940
- FAA San Francisco Airports District Office, 1000 Marina Boulevard, Suite 220, Brisbane, CA 94005-1835
- Monterey Public Library, 625 Pacific Street, Monterey, CA 93940
- Seaside Public Library, 550 Harcourt Street, Seaside, CA 93955

Any written comments on the Draft EA should be submitted to the following address:

**Monterey Regional Airport, 200 Fred Kane Drive, Suite 200, Monterey, CA 93940**  
**Attn: Chris Morello, Deputy Director of Strategy and Development**  
**planning@montereyairport.com**

The cutoff date for comment submission is not later than **5:00 PM - Pacific Daylight Time, April 6, 2020**. Please allow enough time for mailing. All comments must be **received** by the deadline, not simply postmarked by that date.

Before including your name and telephone number, email, or other personal identifying information in your comment, be advised that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask FAA in your comment to withhold from public review your personal identifying information, FAA cannot guarantee that it will be able to do so.

3/06/2020



## PUBLIC NOTICE

### Notice of Extending Public Comment on a Draft Environmental Assessment for the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations at Monterey Regional Airport

Notice is hereby given that the public comment period has been extended for the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations at Monterey Regional Airport Draft Environmental Assessment. Pursuant to Title 49, United States Code, Section 47106(c)(1)(A), the Monterey Peninsula Airport District (District) proposes to seek Federal Aviation Administration (FAA) approval of the Airport Layout Plan for the Monterey Regional Airport and the use of federal funds for the proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations. A Notice of Availability of a Draft Environmental Assessment previously made available on March 6, 2020, and set to expire on April 6, 2020, **has been extended an additional 14 days until 5:00 P.M. (Pacific Daylight Time) on April 20, 2020.**

As of March 6, 2020, a copy of the Draft EA is available for review at

<http://montereyea.airportstudy.com/environmental-assessment/>

Hard copy documents are available at the following locations during normal business hours:

- Monterey Regional Airport, 200 Fred Kane Drive, Suite 200, Monterey, CA 93940 8:00-5:00 Monday-Friday
- FAA San Francisco Airports District Office, 1000 Marina Boulevard, Suite 220, Brisbane, CA 94005-1835
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[planning@montereyairport.com](mailto:planning@montereyairport.com)

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(831) 726.4382

MONTEREY PENINSULA AIRPORT DISTRICT  
Account No. 2141463  
200 FRED KANE DR  
STE 200  
MONTEREY, CA 93940

Legal No. 0006473529  
Public Notice - Extending Public Comment

Ordered by: Chris Morello

## PROOF OF PUBLICATION

STATE OF CALIFORNIA  
County of Monterey

I am a citizen of the United States and a resident of the County aforesaid. I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of The Monterey Herald, a newspaper of general circulation, printed and published daily and Sunday in the City of Monterey, County of Monterey, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Monterey, State of California; that the notice, of which the annexed is a printed copy (set in type not smaller than 6 point), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

03/26/20

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Executed on 03/26/2020 at Monterey, California.

Signature

This space is reserved for the County Clerk's Filing Stamp

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3/26/2020



## PUBLIC NOTICE

### Notice of Final Extension of the Public Comment

on a Draft Environmental Assessment for the  
Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation  
& Associated Building Relocations at Monterey Regional Airport

**Notice is hereby given that the public comment period has been extended for the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations at Monterey Regional Airport Draft Environmental Assessment.** Pursuant to Title 49, United States Code, Section 47106(c)(1)(A), the Monterey Peninsula Airport District (District) proposes to seek Federal Aviation Administration (FAA) approval of the Airport Layout Plan for the Monterey Regional Airport and the use of federal funds for the proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations. A Notice of Availability of a Draft Environmental Assessment previously made available on March 6, 2020, and set to expire on April 6, 2020, **and has been extended an additional 24 days until 12:00 P.M. (Pacific Daylight Time) on May 1, 2020.**

As of March 6, 2020, a copy of the Draft EA is available for review at

<http://montereyea.airportstudy.com/environmental-assessment/>

Hard copy documents are available at the following locations during normal business hours:

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[planning@montereyairport.com](mailto:planning@montereyairport.com)

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Monterey Regional Airport  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940

Public Notice  
April 6, 2020  
Page 1 of 1

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# The Monterey County Herald

PO Box 271  
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2141463

MONTEREY PENINSULA AIRPORT DISTRICT  
200 FRED KANE DR  
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MONTEREY, CA 93940

## PROOF OF PUBLICATION

STATE OF CALIFORNIA

County of Monterey

I am a citizen of the United States and a resident of the County aforesaid. I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of The Herald, a newspaper of general circulation, printed and published daily and Sunday in the City of Monterey, County of Monterey, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Monterey, State of California; that the notice, of which the annexed is a printed copy (set in type not smaller than 6 point), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

**04/06/2020**

I certify (or declare), under penalty of perjury, that the foregoing is true and correct.

Executed on 05/27/2020 at Monterey, California.



Signature

Legal No. **0006476186**

### PUBLIC NOTICE

#### Notice of Final Extension of the Public Comment

on a Draft Environmental Assessment for the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations at Monterey Regional Airport

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Publish 4/6/2020

**ENVIRONMENTAL ASSESSMENT ON A  
PROPOSED AIRPORT SAFETY ENHANCEMENT PROJECT  
FOR TAXIWAY "A" RELOCATION & ASSOCIATED BUILDING RELOCATIONS  
AGENCY/STAKEHOLDER COORDINATION LIST**

---

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### **Other Stakeholders**

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Owner  
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Matthew Wright  
President  
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16264 Church St. #102  
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Tony Cerda, Chairperson  
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**DRAFT ENVIRONMENTAL ASSESSMENT  
COMMENTS AND RESPONSES**

The following matrix lists all commenters and the organization or city where they reside, where noted. Topical responses are then provided. Following the topical responses, the comment letters and emails are provided, followed by individual responses.

<b>Letter/ Email No.</b>	<b>Commenter/Title</b>	<b>Organization or City of Residence</b>	<b>Comment No(s)</b>
1.	Patti Dunton, Tribal Administrator	Salinan Tribe of Monterey and San Luis Obispo Counties	1
2.	Debra L. Hale, Executive Director	Transportation Agency for Monterey County	2
3.	Stephanie Locke, Water Demand Manager	Monterey Peninsula Water Management District	3-5
4.	Alison Kerr, Mayor	City of Del Rey Oaks	6-11
5. (with addl. comments attached)	Clyde Roberson, Mayor	City of Monterey	12-37
5a	Richard Ruccello, CONA President	Casanova Oak Knoll Neighborhood Association (CONA)	38-45
5b	Robert Yoha, resident	Monterey (Casanova Oak Knoll neighborhood)	46-49
5c	Jim & Denise Franco, residents	Monterey (Casanova Oak Knoll neighborhood)	50-52
5d	Scott & Faith Dent, Board members	CONA	53-54
5e	Kimberle Herring, resident	Monterey (Casanova Oak Knoll neighborhood)	55-56
5f	Roman Barnes, resident	Monterey (Casanova Oak Knoll neighborhood)	57
5g	Harry Christensen, resident	Monterey (Casanova Oak Knoll neighborhood)	58
5h	Forrest Melton & Kristine Tarozzi, residents	Monterey (Casanova Oak Knoll neighborhood)	59-62
5i	Jon Selbicky, resident	Monterey (Casanova Oak Knoll neighborhood)	63
5j	Susan Nine, President	Monterey Vista Neighborhood Association	64
5k	Esther Malkin, resident	Monterey (Casanova Oak Knoll neighborhood)	65
5l	Mike Brassfield, resident	Monterey (Casanova Oak Knoll neighborhood)	66
5m	Greg and Claudia Heydeman, residents	Monterey (Casanova Oak Knoll neighborhood)	67
5n	Kenneth Bear, resident	Monterey (Casanova Oak Knoll neighborhood)	68
5o	Anne Kern, resident	Monterey (Casanova Oak Knoll neighborhood)	69-71
5p	Dan Cutler, resident	Monterey (Casanova Oak Knoll neighborhood)	72
5q	Joan Reta, resident	Monterey (Casanova Oak Knoll neighborhood)	73-75
5r	No names, resident near Airport	Not specified	76
5s	Dorothy Baumann, JB Borris, residents	Monterey (Casanova Oak Knoll neighborhood)	77
5t	John Besseling, resident	Monterey (Casanova Oak Knoll neighborhood)	78
5u	Eric Bernhard, resident	Monterey (Casanova Oak Knoll neighborhood)	79
5v	Mike Rausch, no information	Not specified	80
5w	Wendy & Mark Mulligan, residents	Monterey (Casanova Oak Knoll neighborhood)	81



<b>Letter/ Email No.</b>	<b>Commenter/Title</b>	<b>Organization or City of Residence</b>	<b>Comment No(s)</b>
5x	Duane Dykeman, resident	Monterey (Casanova Oak Knoll neighborhood)	82-83
5y (2 <sup>nd</sup> comment)	Denise Franco, resident	Monterey (Casanova Oak Knoll neighborhood)	84
5z	Alan & Sharon Sparkman, residents	Monterey (Casanova Oak Knoll neighborhood)	85
5aa	Louis Algaze, resident	Monterey (Casanova Oak Knoll neighborhood)	86
5bb	Mike Pekin, resident	Monterey	87
5cc	Richard Jensen & Jaimem Rosario, residents	Monterey (Casanova Oak Knoll neighborhood)	88
5dd	Sandra Bear, resident	Monterey (Casanova Oak Knoll neighborhood)	89
5ee	James Gilliland, resident	Monterey (Casanova Oak Knoll neighborhood)	90
5ff	Barbara Lind Hirst, resident	Monterey (Casanova Oak Knoll neighborhood)	91
6 (2 <sup>nd</sup> comment)	Mike Rausch, resident	Monterey	92
7 (2 <sup>nd</sup> comment)	Forrest Melton & Kristine Tarozzi, residents	Monterey (Casanova Oak Knoll neighborhood)	93
8	Lisa Duggan, resident	Monterey (Casanova Oak Knoll neighborhood)	94-95
9	Nina Beety, resident	Monterey	96
10 (with attachments)	R.A. Wiley, Captain, U.S. Navy Commanding Officer	U.S. Department of the Navy, Naval Support Activity Monterey	97
11	Juan Manuel Ezcurra, resident	Del Rey Oaks	98
12	Roxane Buck, resident	Del Rey Oaks	99
13	Carol Kaplan, resident	Del Rey Oaks	100
14	Cindy Hickey, resident	Del Rey Oaks	101-102
15	Ella Ezcurra, resident	Del Rey Oaks	103
16	Margo Ezcurra, resident	Del Rey Oaks	104
17	Alexis Naficy, resident	Del Rey Oaks	105
18	Wayne Marien & Elizabeth Stacey, residents	Del Rey Oaks	106-107
19	Cristofer & Shelley Cabanillas, residents	Del Rey Oaks	108
20	Arlen Grossman, resident	Del Rey Oaks	109
21	Kim Shirley, resident	Del Rey Oaks	110-112
22	Ken Rutherford, resident	Del Rey Oaks	113-115
23	Alice Angell Green, resident	Del Rey Oaks	116
24	Douglas Mackenzie, resident	Del Rey Oaks	117
25	Karen Harris, resident	Del Rey Oaks	118-125
26	Susan Ragsdale-Cronin, resident	Del Rey Oaks	126
27	Mike Weaver, Chair	The Highway 68 Coalition	127-133

## Topical Comments and Responses

### **1. The public review period should be extended due to the COVID 19 situation.**

The Draft Environmental Assessment's (EA) public review and comment period was extended an additional 24 days for a total public review and comment period of 56 days. Project-related materials are available on the EA study website at: [www.montereyea.airportstudy.com](http://www.montereyea.airportstudy.com).

### **2. All airport access should be from a state highway (either State Route 218 or State Route 68) instead of on local neighborhood streets.**

Airport access has been provided on Airport Road since the Airport was constructed in the 1930s. In the 1930s, the Airport was constructed on land formerly held by Del Monte Properties with funding provided by the Great Depression-era Works Projects Administration. The Monterey Peninsula Airport District was created in 1941 to manage and operate the Airport and airport lands. The Monterey Peninsula Airport District is a separate legal entity that is not incorporated into the county or any of the surrounding cities. The original configuration of the Airport included two runways and a hangar with access provided by Airport Road. A topographical map from 1947 shows the Airport Road access from N. Fremont Street to the north general aviation (GA) apron (Aviation Lane) (**Attachment 1**). As shown on the topographical map, there was no residential neighborhood along Airport Road in 1947.

During World War II, the Airport served as one of the auxiliary airfields to Naval Air Station Alameda. The core of the original Naval Auxiliary Air Station at Monterey was in the northwest quadrant area of the Airport. After the war ended, the United States (U.S.) Navy placed the Naval Auxiliary Air Station in Monterey in caretaker status and commercial passenger flights resumed. However, the Air Station was reactivated periodically for a variety of evolving roles and missions.

Following the war, commercial passenger flights resumed and, in 1948, construction of a new terminal began on the south side of the airfield. In 1972, the Naval Auxiliary Air Station at Monterey was decommissioned for the last time, although the neighboring Naval Postgraduate School (NPS) at the former Del Monte Hotel complex continues to operate. Directly northwest of the airport property is the Fleet Numerical Meteorology and Oceanography Center. Further west are the grounds of the former polo fields of the Del Monte Hotel, now occupied by a laboratory and recreational area of the NPS, including the Monterey Pines Golf Club.

Based on aerial photography, the Casanova Oak Knoll and Rosita Road neighborhoods appear to have been constructed between 1950 and 1956 (**Attachment 1**). Thus, use of Airport Road as an access to the north side of the Airport predates the development of either residential neighborhood. Airport Road has been used historically, not only as an airport access road, but as access for several government and quasi-government facilities. Even after the construction of a passenger terminal off Highway 68 and Olmsted Road, the Airport's northern access on Airport Road and Aviation Lane continued to provide access to the northwest quadrant of the Airport, as

well as the Naval Air Station activity and north GA apron tenant access, even as residential development began to encroach upon both the Airport and its pre-existing access. Airport Road has provided access to the Airport since its construction, and only after construction of the Airport did the neighborhood along Airport Road begin to develop and utilize Airport Road as a local neighborhood street sharing access with the airport traffic.

**3. Airport rescue and firefighting (ARFF)-related traffic on Airport Road through the Casanova Oak Knoll neighborhood will cause safety, noise, and traffic impacts. Homes will suffer in terms of property values and quality of life.**

Consistent with federal regulations, an airport rescue and firefighting facility (ARFF) is not required to provide off-airport emergency services.<sup>1</sup> Operationally, moving the ARFF to the north GA area would remove its emergency activity away from the passenger terminal and fixed base operator areas, which would reduce the amount of congestion on the south side of the airfield. The permanent ARFF location on the north side meets FAA standards for response times on a Part 139-certificated airport. Analysis of the north side location for the ARFF facility has shown that the ARFF three-minute response time required under Part 139 regulations can be met, with the estimated response time less than one minute.

Section 1.3.3 of the Draft EA states that the relocated ARFF facility “would be provided per FAA requirements. (Its use as a joint facility with the City of Monterey to provide structural fire support for the surrounding community would be subject to negotiations with the City of Monterey when the Airport’s current joint agreement with the city expires [2024].)” Although the existing ARFF building at the Airport is currently staffed by City of Monterey personnel in exchange for off-airport emergency service, this “mutual advantage” Fire Agreement between the city and the Airport is subject to re-negotiation and/or cancellation by either party (see **Attachment 2**, Section 2.3 Termination). The City of Monterey has five other fire stations and is responsible for providing its own fire protection and emergency services.

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<sup>1</sup> Monterey Regional Airport is a federally regulated facility that is required to have an Airport Operating Certificate under Title 14, Code of Federal Regulations, Part 139 (Part 139), in addition to meeting numerous federal regulations. These regulations include standards for ARFF equipment and services, including response times and personnel training, the handling and storing of hazardous materials, and safety inspection and reporting procedures. The Airport must maintain its ARFF equipment and personnel based on its established ARFF index, Index B. (ARFF indexes are on a scale from A to E, with A applicable to the smallest aircraft based on wingspan and E applicable to the largest aircraft.) Index B includes aircraft at least 90 feet but less than 126 feet in length.

FAA Advisory Circulars (ACs) also include specific guidance on topics related to airport design, operation, and maintenance. The use of FAA ACs is mandatory for those airport construction projects receiving funds under the Airport Improvements Program (see FAA Grant Assurance No. 34, Policies, Standards, and Specifications). The following ACs are pertinent to fire/emergency services at the Airport: FAA AC 150/5210-15A, *Aircraft Rescue and Firefighting Station Building Design* (FAA 2008) provides additional guidance on the design of the ARFF building; FAA AC 150/5370-2G, *Operational Safety on Airports During Construction* (FAA 2017) sets forth guidelines for operational safety on airports during construction.

The City of Monterey has indicated that “regularly-occurring” off-airport emergency vehicles on Airport Road from the relocated ARFF would not be acceptable. (See City of Monterey comment letter, page 12, last sentence.) Therefore, to ensure consistency with City of Monterey general plan and neighborhood plan policies, once the ARFF is relocated, the north side ARFF would no longer provide off-airport emergency services (see LU-1, Section 4.3.7, Final EA). The cancellation of the city’s current Fire Agreement with the Airport would mitigate the city’s concerns regarding general plan and neighborhood plan policy inconsistencies. If other off-airport emergency access to the relocated ARFF becomes available at a later time, the Airport would continue to consider mutually advantageous emergency service arrangements with the city to the extent possible. Also, the City of Monterey may, at its discretion, reconsider the continuing value of retaining the Fire Agreement and amend its general plan and *Casanova Oaks Neighborhood Plan* policies and goals.

#### **4. What are the traffic-related impacts of using Airport Road for the Proposed Action on the north side of the Airport?**

Under the Proposed Action, public access to the north GA area would continue to use the Airport’s existing access on Airport Road to N. Fremont Street for the planned north side improvements, i.e., tenant access to 51 GA hangars and employees or deliveries for the ARFF. Section 4.3.10.1 of the Draft EA contains an evaluation of the traffic impacts related to the Proposed Action. The Proposed Action would remove trips from the south side of the Airport and redistribute them to the north side. However, as shown in Table 4Q of the Draft EA, these new “north side” trips would be offset by the removal of existing vehicle trips associated with the leased landscaping storage operations within the proposed north side stockpile areas. Average daily trips (ADT) associated with the Proposed Action and ADT to be removed are both summarized in Table 4Q of the Draft EA.

The trip generation rates for 44 relocated GA tenants and 7 new hangars are based on gate counts at the Airport’s existing southeast GA hangar gates between November 1 and December 31, 2016. These hangar traffic counts were taken at the existing southeast GA area in 2016 during a time when a flight school began operations and reflect a high-use period of the Airport (see Table 1B, Draft EA, note for 2016). Trips generated by the relocated ARFF were based on Monterey Fire Department staffing, schedule, and incident reports (November 1 – December 31, 2016). (Note that the new trip generation would be less than these existing counts if structural fire support is no longer provided by the relocated ARFF. Based on the last twelve months of ARFF incident reports, approximately 85 percent of the calls responded to by the existing ARFF were off-airport emergencies.) Trip generation for the leased landscaping storage operations are based on trip counts conducted from September 21 – 27, 2019 and include daily trips by multiple workers that access the work site at the start of the work day and return to bring back materials for storage at the end of the day (**Attachment 3**). Traffic counts taken in September reflect an average (or typical) use for the landscaping services, as landscaping trips would be expected to be higher in the spring and summer and lower in the winter. Overall, the Proposed Action is estimated to reduce existing airport-related ADT on Airport Road by 30 trips/weekday, including existing trips by heavy trucks.

To quantify the amount of truck traffic currently occurring due to the month-to-month leased landscaping storage operations, the percentage of traffic associated with the existing leased landscape storage operations (by vehicle classification) for a typical work week was also counted (**Attachment 3**). Of the total of 712 vehicles counted, approximately 21 percent were classified as heavy vehicles (i.e., Class 3-13 based on Federal Highway Administration classifications, which are vehicles with more than one axle). Conversely, the only project-related multi-axle vehicles anticipated to occur as a result of the Proposed Action are occasional delivery trucks.

**5. The Airport should continue to pursue north side access through Del Rey Oaks as identified in the Airport Master Plan EIR.**

The Proposed Action considered in this EA is a federal action being analyzed under federal environmental law (i.e., NEPA and other federal “special purpose” laws) for federal funding and approval of an airfield safety enhancement project. As stated in Chapter 2, Alternatives of the EA, FAA has determined that based on federal statutory requirements including Title 49 United States Code (U.S.C.) §47106(a)(1), FAA-approved projects are required to be consistent with the land use plans of public agencies authorized by the State to plan for development of the area surrounding the Airport. As such, FAA will not approve a Proposed Action that is inconsistent with the City of Del Rey Oak’s general plan policies. City of Del Rey Oaks General Plan Circulation Policy C-17 *Airport Plan* states: “The City will not support the potential north side access from Highway 218 and Del Rey Gardens Drive or any airport access road through the City of Del Rey Oaks.” (City of Del Rey Oaks 1997).

Based on the City of Monterey’s comment letter, using Airport Road for “regular-occurring emergency access through the Casanova Oak Knoll neighborhood” (see Comment #22) is also inconsistent with City of Monterey general plan and neighborhood policies. Therefore, to ensure consistency with City of Monterey general plan and neighborhood plan policies, once the ARFF is relocated, the north side ARFF would no longer provide off-airport emergency services (see LU-1, Section 4.3.7, Final EA). The cancellation of the city’s current Fire Agreement with the Airport would mitigate the city’s concerns regarding general plan and neighborhood plan policy inconsistencies.



# Salinan Tribe

Of Monterey and San Luis Obispo Counties

Contemporary Lead  
Gary Pierce



Traditional Co-Leads  
Mary Rodgers

April 14, 2020

Monterey Regional Airport  
Ms. Chris Morello (MPAD)  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940  
planning@montereyairport.com

Subject: Review of the Environmental Assessment for the Monterey Regional Airport- Proposed Safety Enhancement Project.

Greetings Ms. Morello,

We have reviewed the proposed project and have the following comments and concerns. We believe ground disturbing activities for the project may disturb buried cultural resources. Because of this we would request that all ground disturbing activities for this project be monitored by a cultural resource specialist from our tribe.

We would also like to be kept informed as the project moves forward. If you have any questions please feel free to contact me.

Xayatspanikan,

Patti Dunton, Tribal Administrator

#1

April 15, 2020

Ms. Chris Morello  
Deputy Director of Strategy and Development  
Monterey Regional Airport  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940

*via email: [planning@montereyairport.com](mailto:planning@montereyairport.com)*

**RE: Comments on Draft Environmental Assessment Proposed Airfield Safety Enhancement Project**

Dear Ms. Morello:

The Transportation Agency for Monterey County is the Regional Transportation Planning and Congestion Management Agency for Monterey County. Agency staff has reviewed the Environmental Assessment for the Proposed Airfield Safety Enhancement Project and do not have specific comments on the Environmental Assessment.

However, the Transportation Agency offers the following design considerations:

- State Route 68 is one of the key east-west routes available for bicyclists. Please facilitate safe bicycle and pedestrian access between the airport and State Route 68 around construction activities and in the final design.
- During the construction of the proposed surface parking lots, consideration should be given to the installation of additional electric vehicle charging stations for public use at the Airport. New construction provides an opportunity to install this needed infrastructure.

#2

Thank you for the opportunity to comment on the proposed project. If you have any questions, please contact Madilyn Jacobsen of my staff at (831) 775-4402 or [madilyn@tamcmonterey.org](mailto:madilyn@tamcmonterey.org).

Sincerely,

Debra L. Hale  
Executive Director



April 28, 2020

Mr. Chris Morello  
Deputy Director of Strategy and Development  
Monterey Regional Airport  
200 Fred Kane Drive, Suite 200  
Monterey, California 93940

**Subject: MPWMD Comments on Monterey Regional Airport's Draft Environmental Assessment for Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations at Monterey Peninsula Airport, Monterey**

Dear Mr. Morello:

The Monterey Peninsula Water Management District (MPWMD or District) appreciates the opportunity to comment on the Monterey Regional Airport's Draft Environmental Assessment (DEA) for Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations dated March 2020, for the Monterey Peninsula Airport, Monterey. The project is described as multi-phased safety enhancement project at the Airport. Phase II improvements include demolition of the existing 70,000 square-foot passenger terminal building being replaced with an approximately 100,000 square-foot new building. Phase III replaces 126,000 square-feet of hangar space with 90,500 square-feet of new hangar space. The project incorporates new vehicle parking lots and major associated infrastructure throughout the Site. The District's comments below apply to Phases I and II and are based on current rules and policies which are subject to revision by action of the Board of Directors. The District has the following comments:

Water Permit Requirement

Water Permits from MPWMD will be required for this project. District Rule 20 requires Water Permit for any Change of Use or any expansion of a Non-Residential use, as well as for any landscaping changes that will result in an Intensification of Use. The construction of the new passenger terminal building and hangars will require issuance of Water Permits by MPWMD.

Phase I and II Water Demand Calculations

The project description for the new terminal is vague and does not provide details on the breakdown on associated uses, i.e., restaurant seats, coffee shop square-footage, etc. The Non-Residential water factors are found in District Rule 24, Table 2, *Non-Residential Water Factors*. The District will calculate the Capacity of the terminal building and hangars as Group I uses with a water use factor of 0.00007 Acre-Feet Annually (AFA)/Square-Foot. However, associated uses, such as restaurants, bars, and coffee shops, will be accounted for according to the business type and water factor shown on Table 2. The District will also require that landscape installation/renovations comply with the provisions of District Rule 142.1, *Water Efficiency Landscape Requirements*. To ensure that outdoor consumption will be maintained at maximum efficiency, the District will require one or more Cal-Am Water Meters for the landscape.

#3

The DEA states that the Airport currently has 5.197 Acre-Feet of water in its Paralta Allocation account for use on the Airport Site. The District confirms that this Allocation is available for use at the Airport Site as of this date. Water Permits will be issued for the project as long as sufficient Water is available at the time of the application.

#3  
cont.

Water Credits

The District has no information regarding the undocumented potential Water Credits for the Monterey Regional Airport. A District inspection will be necessary to document the existing uses before any demolition occurs.

Water Section, (Page 3-31, Section 3.3.8.3)

This section contains the following statements: *“Based on the water allocation established by MPWMD in June 1993, the Airport has 8.10 acre-feet AF of water to consume every month.”* and *“The Airport, therefore, has 5.20 AF per month remaining of its original allocation for future uses.”* This statement is inaccurate and should be corrected. The MPAD was allocated 8.1 acre-feet of water for new construction and expansions of use when the last Allocation was released in 1993. Each Water Permit for expansion of Capacity debits the Allocation. It is not an amount of water available for consumption each month, it is an amount of water available to offset new and expanded Capacity.

#4

Water Meters and Moratorium on New and Expanded Water Service Connections

On March 24, 2011, the California Public Utilities Commission (CPUC) approved a moratorium on new water service Connections in the Cal-Am system. This action enacted a moratorium on new or expanded water service Connections for projects that failed to obtain all necessary governmental permits before October 20, 2009. The moratorium on expanded water service Connections may affect the Monterey Airport Project.

Conclusion

Presently the Monterey Regional Airport has 5.197 AFA remaining in its Paralta Allocation for expansions and improvements. The next water to become available for development will likely occur in the next couple of years when the Cease and Desist Order against California American Water is lifted, and a new water supply is available. MPWMD has not reviewed or documented the existing water uses (Water Credit) on Site and will need to do an inspection of facilities planned for demolition.

#5

District staff appreciates the opportunity to comment on the Monterey Regional Airport’s Draft Environmental Assessment for Airfield Safety Enhancement Project for Taxiway “A” Relocation & Associated Building Relocations at Monterey Peninsula Airport, Monterey.

If you have any questions or would like to discuss our comments, please contact Gabriela Bravo or Stephanie Kister Campbell at 831-658-5601 or [gabby@mpwmd.net](mailto:gabby@mpwmd.net) or [s.kister@mpwmd.net](mailto:s.kister@mpwmd.net).

Sincerely,



Stephanie Locke  
Water Demand Manager

U:\demand\CEQA Docs\20200410\_MPAD\_Draft\_EA\_Response.docx







# CITY OF DEL REY OAKS

650 CANYON DEL REY RD. · DEL REY OAKS, CALIFORNIA 93940  
PHONE (831) 394-8511 · FAX (831) 394-6421

**RECEIVED**

**MAY 01 2020**

**MONTEREY PENINSULA  
AIRPORT DISTRICT**

May 1, 2020

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

Subject: City of Del Rey Oaks Comments on Draft Environmental Assessment for Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations

Dear Mr. La Pier:

The City of Del Rey Oaks ("City") appreciates the opportunity to provide comments to the Draft Environmental Assessment (EA) associated with the proposed Airport Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocation (Proposed Action).

The City understands and supports the Airport's efforts to implement improvements that will enable Monterey Regional Airport to continue to accommodate safe air travel. The City appreciates the changes made to the project based on our comment letter for the Airport Master Plan EIR dated November 8, 2018 and public comment received by the Airport Board. We also appreciate the presentation by Airport Board Chair Mary Anne Leffel at the City of Del Rey Oaks City Council meeting on March 24, 2020.

Del Rey Oaks residents have expressed concern about the potential of a North Side access road through the City, and increased noise pollution associated with development on the North side. The City of Del Rey Oaks appreciates the consideration and subsequent decision to select another option for the North Side access. The City of Del Rey Oaks respectfully submits the following comments as it relates to the proposed action:

1. "North Side" Road

The City continues to oppose a North side access road. The City acknowledges that the FAA, in accordance with 49 U.S.C. §47106(a)(1), cannot approve any road alignment alternative through the City of Del Rey Oaks until the City of Del Rey Oaks changes its General Plan Policy C- 17. The City has no plan to amend its General Plan in this manner.

#6

2. Noise Impacts

The City has adopted open space/conservation and noise policies. There is insufficient data to effectively analyze the impacts on City Policies because there is no specific plan for the proposed north side development at the Airport. Therefore, further environmental analysis would be required if more specific long-term projects are implemented to assess construction, aircraft and vehicular noise.

#7



3. ARRF Location

The City supports the location of the ARRF remaining on the South side of the Airport, which would ensure continuation of rapid off-airport firefighting response times and prevent emergency vehicles from traveling through and near adjoining jurisdictions' residential areas.

#8

4. Construction of General Aviation Hangars and traffic reduction on Airport Road

The City supports the location of the newly constructed aviation hangars as outlined in the proposed action with long term access via Airport Road. The City supports access during the construction phase via the improved NE service road, also called the construction haul route. The City also supports continued efforts to reduce overall vehicle trips along Airport Road, such as those resulting from the recent termination of certain leases on the North side.

#9

5. Existing Environmental Contaminants

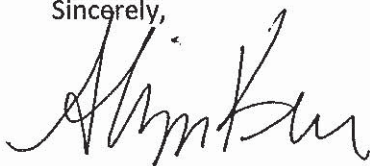
The City urges the Airport to take every precaution to protect residents of neighboring jurisdictions, Airport employees and visitors as well as adjacent downhill properties and waterways from existing and introduced contaminants during and after construction of the proposed action.

#10

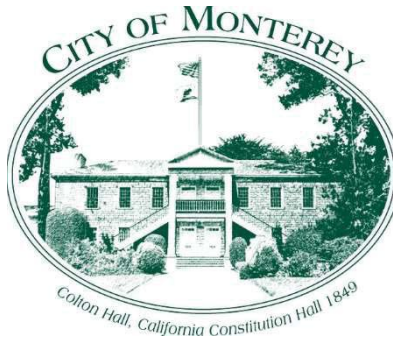
The City of Del Rey Oaks encourages the Monterey Regional Airport to provide on-going public outreach as this project and its effects upon our residents move forward. The establishment of an Airport Roundtable with local jurisdictions would help to disseminate project information, address noise and environmental issues and provide a valuable public venue for continued dialogue with stakeholders.

#11

Sincerely,



Alison Kerr  
Mayor  
City of Del Rey Oaks



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

#12

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.

#12  
cont.

**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.

#13

**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.

#14

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.

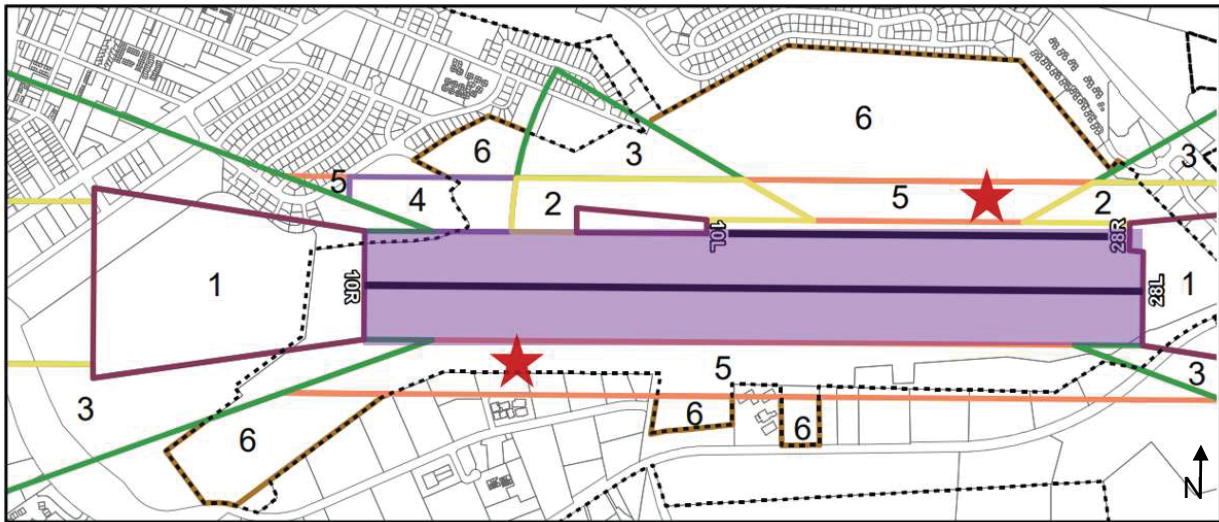
#15

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.



#15  
cont.

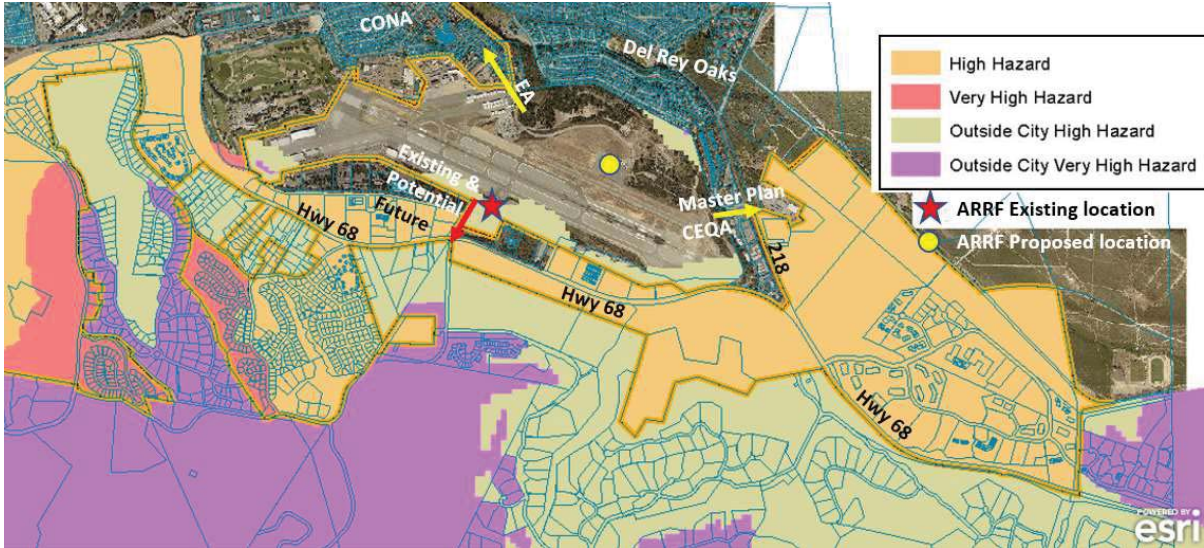
The context of the proposed ARFF north side location and the intensity of consequences:

- 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.

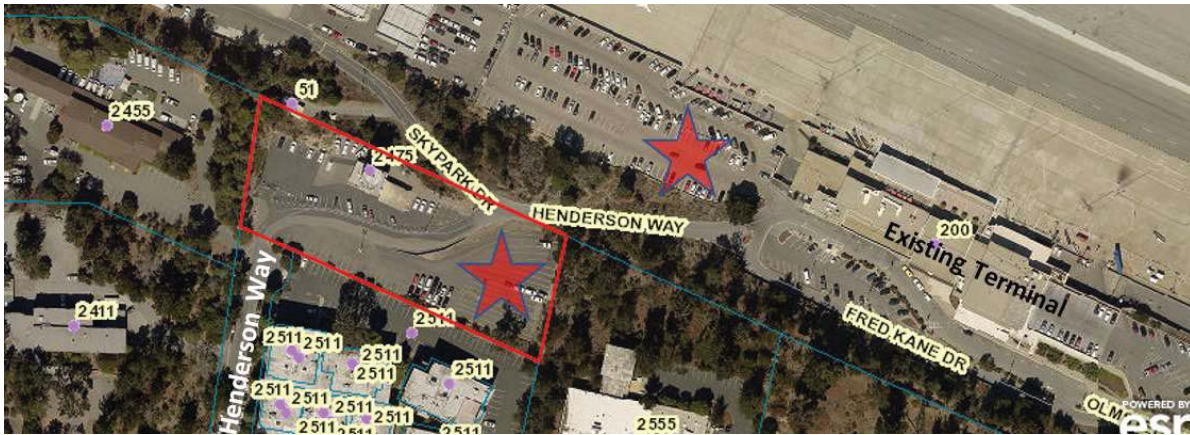


Figure 2: Showing north and south side ARFF opportunity locations relative to safety zones, with the RPZ zone shaded in purple and Runway, arrows showing access points.



#15 cont.

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.

#16



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.

#17

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

#18

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.

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cont.

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.

#19

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.”

#20

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

<b>TABLE 4Q</b>			
<b>Net Change in Average Daily Trips (ADT)</b>			
<b>North Side via Airport Road</b>			
<b>Land Use</b>	<b>Trip Generation Rate (Weekday)</b>	<b>New Weekday ADT</b>	<b>ADT Including Weekend</b>
Relocated GA Hangars (44 units)	1.41/unit <sup>1</sup>	62	59
Relocated ARFF Building	N/A	20 <sup>2</sup>	20
New GA Hangars (7 units)	1.41/unit <sup>1</sup>	10	10
<b>Subtotal (New ADT)</b>		<b>92</b>	<b>89</b>
Less Month-to-Month Storage	N/A	122 <sup>3</sup>	100
<b>Net Change in ADT</b>		<b>-30</b>	<b>-11</b>

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).

#21

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.*

#22

**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.*

#22  
cont.

**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."*

#23

**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.*

#24

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.*

#25

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."*

#26

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.*

#27

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."

#28

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

#28  
cont.

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.

#29

#### 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."

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## 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, as are 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

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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
<b>1. adverse impact on airport operations</b>	LOW	LOW	<b>HIGH</b> ARFF relocation does not have to be at present terminal location	LOW
<b>2. Require substantial amounts of earthwork</b>	LOW	MODERATE	LOW	LOW
<b>3. substantially higher costs</b>	LOW	MODERATE	<b>HIGH</b> Temporary ARFF is not necessary	MODERATE
<b>4. Be inconsistent with the land use plans of public agencies</b>	<b>LOW</b> Inconsistent with Monterey General Plan & CONA Plan	<b>HIGH</b> Judicial review of “infeasibility” has not been provided	<b>n/a</b> This location is consistent with Monterey General Plan	<b>n/a</b> Safety & noise impacts for ARFF not considered

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cont.

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.

#36

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:  
*Mayor Roberson*  
FA1981217DEE4FB...  
Clyde Roberson  
Mayor

- c: City of Monterey Council Members
- Hans Uslar, City Manager
- Nat Rojasathira, Assistant City Manager
- Christine Davi, City Attorney
- Kim Cole, Community Development Director
- Ande Flower, Principal Planner
- Richard Rucello, 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

Additional Comment Letters compiled by the City:

- 1 Richard Ruccello, CONA president
- 2 Robert Yoha
- 3 Jim & Denise Franco
- 4 Scott and Faith Dent, CONA Board Members
- 5 Kimberle Herring
- 6 Roman Barnes
- 7 Harry Christensen
- 8 Forrest Melton and Kristine Tarozzi
- 9 Jon Selbicky
- 10 Esther Malkin
- 11 Mike Brassfield
- 12 Kenneth Bear
- 13 Ann Kern
- 14 Dan Cutler
- 15 Joan Reta
- 16
- 17 Dorothy Baumann , JB Borris
- 18 John Besseling
- 19 Eric Bernhard
- 20 Mike Rausch
- 21 Wendy Milligan
- 22 Duane Dykema
- 23 Denise Franco
- 24 Alan and Sharon Sparkman
- 25 Louis Algaze
- 26 Michael Pekin
- 27 Richard Jensen, Jaimem Rosario
- 28 Sandra Bear
- 29 Barbara Lind Hirst







## CASANOVA OAK KNOLL NEIGHBORHOOD ASSOCIATION

PO BOX 2304, Monterey, CA 93942  
Fax 831-375-3465 • Email conamonterey@aol.com

April, 4, 2020

Chris Morello, Monterey Airport Planning  
CONA Board of Directors  
Monterey Airport District Board of Directors  
City of Monterey City Council  
Tamara Swann, Western-Pacific Regional Deputy Administrator Federal Aviation Authority

Dear Ms. Morello:

This is a request for the Federal Aviation Authority (FAA) to put on hold the May 1, 2020 response deadline for the Monterey Regional Airport's Draft Environmental Assessment (DEA) for Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations.

It is also requested the new deadline for response be reset in excess of 30 days following the date on which the citizens of Monterey have the right for all age and risk groups to rightfully assemble to meet and confer in groups of 50 or more. This is not a tactic but merely reality based upon the national emergency directives of the President and the Governor.

The developing Corvid-19 pandemic and subsequent shelter in place orders was ordered first by the City of Monterey on March 17, 2020 followed by a state wide shelter-in-place Governor's order on March 20th. Having restricted the ability for our citizens to assemble in person for any and all activities. Our right to assemble has been restricted by a lawful order to protect public safety. Due to the pandemic, we cannot gather to discuss and respond to meet the April 20th deadline for the DEA or until the declaration of public emergency is withdrawn. The Airport's Draft Environmental Assessment for Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations Is in realty, the second draft and utilizes the alternative approach as originally approved in the original assessment.

We believe this second alternative which is now the recommended action, presents public safety hazards and environmental impacts which will negatively impacts CONA and the City of Monterey.

On March 10th 2020, the two neighborhood associations and the City of Monterey received notice of the DEA's extensive material to be reviewed and responded to. On March 18, Richard Ruccello, President of the Casanova Neighborhood Association contacted Michael La Pier, Airport Director, requesting a delay due to the pandemic preventing any cogent action. The Airport denied our request. We were informed the timeline belongs to the FAA.

The adopted EIR picked Alternative 1, the explanation for rejecting that Alternative does not explain the facts that the Airport should have access to Hwy 218. The EIR also describes in detail that Alternative 2 would not work for relocation of the Airport Fire because of unacceptable response times. The Del Rey Oaks access solved those problems. The Airport knew

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that the Del Rey Oaks General Plan prohibited this use (see CONA response to EIR dated October 17, 2018).

In 1983 the Airport purchased a property adjacent to Del Rey Gardens Way. In 1997 the Del Rey Oaks General Plan prohibited Airport access to that road. At various dates, Del Rey Oaks approved new development fronting that road, the Moose Lodge, a warehouse district, a marijuana manufacturing, office uses and in 2001 Stone Creek Shopping Center. All these uses with higher traffic counts than the Airport project. County records show the Airport District holds title to Tarpeys and Stone Creek shopping Center. They have had many options over the years to address their access issues on their own property. CONA requests a copy of all correspondence from the Airport District to Del Rey Oaks opposing their loss of access during the Del Rey Oaks General Plan adoption in 1997.

#40

A California Supreme Court ruling states a City's police powers must be applied evenly, to all properties. In this case, the DRO General Plan prohibition targets one property and it appears to be an abuse of their police authority and should be challenged.

If this is accurate, then the Airport can legally challenge that alternative access point.

Second issue, the EA traffic counts are not complete. In 2019 the Del Rey Oaks RV storage was moved to the Airport North side, now there are two RV storage facilities. The counts do not anticipate the demolition and rebuilding of the Old North side. We have asked many times what changes in use does the Airport anticipate and the projected traffic counts? The added cumulative impacts of intensifying uses directly impacts our residential area. We do not see explanations of the traffic counts on how they reflect all the traffic from new uses. For example, on the Fire Department and the new hangers, does the counts include mechanics, maintenance personnel, deliveries, charters, and guests? Please describe the replacement uses for the tow service and outdoor storage businesses and include any new traffic counts into the table.

#41

#42

The time since then has been spent tracking down whom to contact at the FAA. We believe the orders of the United States President and California Governor in this national emergency that no public meetings or gatherings be held removes our public capability to meet and confer on this topic. We respectfully request that the FAA place the deadline on hold until we are once again able to assemble and confer in due process, and to respond with our concerns.

#43

Please note our October 17, 2018 EIR response letter, our concerns listed still apply. The Airport Board voted to adopt that EIR even with those problems listed. The short cut method only addressing CQEA and not the more stringent NEPA is the primary reason for this EA.

#44

Sincerely,  
Richard Ruccello, CONA president

CC US Representative Jimmy Panetta  
Monterey Mayor Clyde Roberson  
Monterey City Council  
Monterey City Manager  
Monterey City Attorney  
Monterey Peninsula Regional Airport, Michael La Pier, Airport Director  
Del Ray Oaks City Manager

# RRuccello public comments

Richard Ruccello, CONA president

I attended three city/airport liaison meetings at the urging of our city.

It was clearly our understanding these meetings were solely discussions and absolutely no decisions were to be made or considered.

At these meetings I asked specific questions on neighborhood concerns, the same ones many times. I never received answers to what I asked. Answers went in circles and evaded the initial request.

We were not told that the Airport already applied for and received an FAA grant with specific time requirements.

So, this was supposed to be a conversation, in reality was a continuous sales pitch. It is impossible to have a one sided conversation and that is exactly what happened. They did not listen, they were thinking only of their next selling point while we talked. After the last meeting the Airport went into their public relations onslaught.

The Casanova Oak Knoll neighborhood has lost any trust we had for the Airport. This entire process is fraught with errors and miscalculations, we urge the Monterey City Council to oppose this development project and to fully support the excellent report Monterey city staff is presenting to you tonight.

Sent from my iPad

----- Forwarded message -----

[REDACTED]

Date: Mon, Apr 6, 2020 at 1:51 PM

**Subject: Public comment for Item 14 - City Council Meeting April 7<sup>th</sup> 2020**

- I strongly support the Staff Report prepared by Community Development for Agenda Item 14.
- I support Attachment 1, proposed City of Monterey letter to the Monterey Regional Airport.
- Please - contact the FAA and request that the flawed public review process for the DEA be delayed until 30 days after the lawful orders restricting public interaction, amongst all risk groups, have been lifted. Even a May 1<sup>st</sup> deadline is unrealistic considering today's circumstances.

#45

## **BACKGROUND – A SECOND ACCESS ROAD TO PREVENT A SINGLE-POINT-OF-FAILURE**

Beginning in 2016, the Airport initiated a safety project to increase clearance distance between the Passenger Terminal and Taxiway A by 327.5 feet per FAA recommendations. The adjacent Casanova Oak Knoll Neighborhood and the City of Monterey expressed concern that *Airport improvements should not cause other safety related issues; and a second access road on the north side was needed, amongst many other concerns.*

In 2019, following CEQA and preparation of an EIR, the Airport approved a Master Plan based on an Alternative 1, which was both environmentally preferred and also the safest alternative for airport operations and protecting public safety. *The Preferred Alternative added a second access road on the north side, to reduce unacceptable emergency response times via Airport Road, and to provide a second access road to prevent a “single-point-of-failure” in the road system into-and-out of the Airport.*

#46

### **ISSUE – HIDDEN AGENDA**

Since approval of their Master Plan in 2019, the Airport has followed a hidden agenda to raise public objections against the second access road on the north side within the City of Del Rey Oaks. The Airport solely engaged Del Rey Oaks residents; thereby raising a public outcry against the northside access road, which they now claim allows them to invalidate the Preferred Alternative of the 2019 Master Plan.

They have used this as a basis for a Draft Environmental Assessment, released March 6, 2020, with a 30 day comment period; to pursue an approach based on a “single-point-of-failure” which relies on Airport Road as the main access point -- creating public safety issues and other negative impacts.

### **AIRPORT HAS PURSUED A MISLEADING AND UNFAIR PUBLIC PROCESS**

- The Airport chose to only mail notices to residents within the City of Del Rey Oaks within 300 feet of the proposed northside access road and along the northern boundary, and they met with them.
- The Airport decided to not mail notices to all City of Monterey residents within 300 feet of the Airport’s boundary and along Airport Drive. The Airport declined to meet with CONA residents.
- The COVID-19 pandemic prevents public gatherings and does not allow trips outside the home other than for essential activities. We cannot assemble to meet or confer; nor can we travel to libraries to read the Airports documents. Due to heavy Internet use, we cannot effectively conduct online meetings. The Airport is not fully acknowledging this and pushing forward unrealistically.

#47

### **CONCLUSION**

The Airport’s recently released DEA fails to follow the approved 2019 Master Plan, it relies on a single-point-of failure by dropping the second access road on the north side. The short comings

#48

are addressed in the Staff Report and comments from Richard Ruccello, President of the Casanova Oak Knoll Neighborhood Association. We went through before with the EIR and Master Plan process.

If I could add anything to your letter to the Airport.

Make the Airport develop a second access road on the north side, using the two non-aviation use parcels they own (which were hidden from the public during the EIR process). These parcels have existing access to both Highways 218 and 68.

The Airport uses the City of Del Rey Oaks for police and fire support. Their police cars, fire trucks, heavy emergency vehicles have to drive the long way around the airport from the northside, negotiate traffic and stop lights through the City of Monterey, then past the County Fairgrounds and up Airport Road often clogged from events and festivals, or cut through narrow residential streets not intended for heavy vehicles or rapid transit. *This round-about route, now a key part of the DEA, presents a previously documented unacceptable emergency response time which was considered unacceptable in the 2019 Master Plan.*

A single-point-of-failure in an aviation system would not be allowed by the FAA.

An airport is an aviation system operating 24/7 - with many aircraft on the ground, approaching and departing over our neighborhoods.

Respectfully,

Robert Yoha



CC

Tamara Swann, Deputy Regional Administrator FAA

Casanova Oak Knoll Neighborhood Association

To: Monterey Regional Airport

My family and I have lived in the Casanova Oak Knoll Neighborhood (CON) for over 40 years. We have enjoyed the slow pace and quiet life style that our neighborhood has offered for all those decades. Now that life style that my family, and neighbors have enjoyed is being threatened by the Monterey Regional Airport's new plan to add an access road for future development on the north side of the runway via Airport Road.

The devastating impacts of this plan to Monterey and CON are numerous and grievous. They range from relocating the Fire Station which increases response times to much needed areas, the potential impact and closure of small businesses in the North Side Industrial Park, and increasing traffic on our beautifully

#48  
cont.

#49

#50



repaved family friendly neighborhood streets. This development plan is poorly timed during the order to shelter in place and seems to be rushed through in order to take advantage of Federal Aviation Administration grant money. No decisions of this magnitude should be rushed. CON has a well documented neighborhood plan, which this poorly proposed plan by the Monterey Airport flies in the face of. The Airport has been a cooperative neighbor in the past, but their recent push to grow beyond themselves has cast them as the ugly neighbor. Why this plan? Why now? This decision could have negative repercussions to our fair CON, as well as the surrounding neighborhoods far into the future. **Development decisions should not be rushed through at any time, least of all while we are ordered to shelter in place.**

#51

The Monterey Airport has other more viable options for an access road that it needs to further investigate or pursue, that is if growth and development in the name of “safety” are truly it’s goals. Airport Road is not a safe access route to the north side of the runway. This alternate plan indicates that the Monterey Airport has abandoned it’s original plan of creating an access passage through Del Rey Oaks via Highway 218. This abandonment was due to the residents there raising their voices in an unified and resound “No!”. We in CON are also raising our voices in an unequivocal “No!” We say “No!” to devastating effects on the CON and it’s carefully crafted Neighborhood Plan to maintain our current way of life. We say “No!” to the Monterey Airport who is pushing their own agenda (especially during this COVID-19 pandemic) whose new plan severely impacts our neighborhood and it’s local businesses in devastating ways. We say “No!” to hasty decisions based on Grant money timelines. My family, and neighbors of CON are imploring our city council and mayor to assist us in protecting our way of life, our neighborhood, and our city at large.

#52

Sincerely,  
Jim & Denise Franco  
[REDACTED]  
*Monterey, CA 93940*

Chris Morello, Monterey Airport Planning  
Kim Cole, City of Monterey Planning  
Andrea Renny, City of Monterey Traffic Engineer  
CONA Board of Directors  
Monterey Airport District Board of Directors  
City of Monterey City Council

We are writing in regards to the Monterey Regional Airport Draft Environmental Assessment for Proposed Airfield Safety Enhancement Project for Taxiway “A” Relocation and Associated Building Relocations.

We would like to express our strong opposition to the relocation of the Airport Rescue and Firefighting Force and Facility (ARFF) Building to the north side of the airport and Airport Road being proposed as the route for public access. In addition, we would like to express our strong opposition to the relocation of the General Aviation to the north side of the airport and Airport Road being proposed as the route for public access.

#53

Airport Road through the Casanova Oak Knoll Neighborhood should not be considered a feasible option for public access into the north side of the airport currently or in the future. There are numerous reasons for this conclusion:

- The Casanova Oak Knoll Neighborhood already has traffic volume and traffic safety issues on Airport Road. These proposed Airport changes would negatively affect the neighborhood causing already frustrated residents even more aggravation.
- We do not need more large vehicles and emergency vehicles regularly using our neighborhood residential streets. Vehicles from the businesses on the Airport seem to be responsible for the majority of large trucks and commercial vehicle traffic on Airport Road along with the disregard for the speed limit.
- Other options such as Del Rey Oaks seem to be a better alternative with less neighborhood interruption and a closer distance to a California State Highway. In addition, Highway 218 seems to be better equipped to handle additional traffic rather than Fremont Street, Fairgrounds Road, Casa Verde Way, Dela Vina Avenue and Montecito Avenue.

The Airport seems to be putting long-term profits, funding and growth over Monterey communities, neighborhoods, families and people. The Environmental Assessment seems to downplay the real effect of the potential negative long-term consequences the proposed Airport changes will have on the Casanova Oak Knoll Neighborhood and Airport Road.

Thank you for the opportunity to comment.

Sincerely,

Scott and Faith Dent, CONA Board Members

----- Forwarded message -----

From: [REDACTED]

Date: Mon, Apr 6, 2020 at 5:20 PM

**My name is Kimberle Herring, I am a Monterey resident of 30 plus years and my home, of over 20 years, is located at the corner of Dundee Drive and Airport Road. I am not prepared to comment on anything specific about the *Environmental Assessment for the Proposed Safety Enhancements Project for the Taxiway "A" Relocation and Associate Building Location*, but that's the point I would like to make. We who live in the Monterey neighborhoods which will be affected by this project, specifically the recent proposed alternative service road- Airport Road (off North Fremont), have not had the opportunity, or proper time, to be fully informed and have our concerns and questions addressed regarding this project, especially so, with the current constraints on public meetings and limitations in accessing public information.**

**I am very much in support of a safer and improved airport and air traffic that travels over our homes daily, but as a resident also very concerned with the impacts of some of the**

#54

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#56

**proposed development upon our quality of life, safety and environment, including the additional traffic, noise, and congestion that will be an expected result from the proposed use of Airport Road as a service road and the relocation of the fire station and hangers.**

**I do understand that using Airport Road as a service road does not comply with Monterey's general plan, and that there are real safety concerns with moving the Fire station; with the increase in response time to those who live in a an area with a much higher fire risk.**

**Our neighborhoods have been at the nexus of some major changes, construction and projects, that have caused and will cause much disruption and impact to our quality of life, and potentially safety and environment for many years to come.**

**We are concerned and need more time to be able to thoughtfully consider the Airport District's proposed plan, so that we can understand the potential significant impacts of this development and have an opportunity to voice our concerns. Please do not approve at this time with out the opportunity to do so.**

**Thank you,**

**Kimberle Herring**



----- Forwarded message -----

From:



Date: Mon, Apr 6, 2020 at 8:10 PM

Regarding the Airport expansion and access via Airport Road in the Casanova Oak Knoll Neighborhood:

While it has always been abundantly clear that the Monterey Regional Airport only has it's own interests in mind, and gives little thought to its neighbors, the current plan to relocate access for the new development via Airport Road is both unsafe and unacceptable.

The use of SR218 and Del Rey Gardens Drive as the new access would not impede kids riding bicycles, or folks out walking their dogs. This is an already dangerous prospect on Airport Road, as nearly everyone exceeds the speed limit, often by as much as 15-20mph over the posted limit. The typical culprits are in their clearly marked commercial vehicles on the way to their businesses on the North side. I see them every single day.

#56

#57

Additionally, it should be mentioned that the Airport already has access via 218 to the parcels they own adjacent to Del Rey Gardens Drive. Let's also not forget that SR218 is a **California State Highway**, and not a residential street like Airport Road.

Furthermore, the traffic study concludes that with the new development, average daily trips will be reduced on Airport Road, which is a farce.

Anyone who has spent time at the North side of the Airport is aware that the majority of the hangars are full of cars- not airplanes. The addition of hangars will clearly only add more cars, and therefore more traffic- and that's just one example. The prospect of emergency vehicles now racing up and down Airport on a daily basis should also be considered. The math simply doesn't add up.

In short, Airport Road is a neighborhood thoroughfare, where people live and play.

Del Rey Gardens Drive has a towing storage yard, an auto body shop, a marijuana processing facility, and a mini-storage complex. SR218 is a state highway.

Why there is even a thought to giving access to this new development via Airport Road, which will increase traffic and decrease response time for emergency vehicles right through the middle of a neighborhood, I cannot understand.

-Roman Barnes

CONA resident of 14 years

----- Forwarded message -----

From [REDACTED]

Date: Mon, Apr 6, 2020 at 9:57 PM

Subject: [City Clerk Monterey] Public comment for Council mtg. 4/7- Item 14

April 6th, 2020

To Persons of Concern:

We are sending this email in Opposition to the "Airport District Plan" to route an access road for their new development through the streets in our neighborhood.

#57  
cont.

#58

My family, friends and neighbors are shocked and appalled that the airport is trying to ram this plan through our neighborhood with such short notice and in light of the facts. Here is a list of some concerns and why we so strongly disagree with this recommendation:

1) The airport already has access to Hwy 218 with parcel #'s 012601033000 / 01260103400 and parcel 259021002000.

2) The DRO general plan is 23 years old and the OPR recommends updating every 10 years.

a) DRO general plan C-17 doesn't match the stated circulation goals.

b) DRO general plan also doesn't meet the definition for Highways according to CA DOT.

c) There are no traffic counts within the DRO general plan or information indicating that SR 218 could not handle the additional traffic.

d) DRO appears to be treating SR 218 as a parkway and not a "Highway"

So this all begs the question, if a highway such as 218 is not suitable as being used for an access road, then why would the Airport assume that a city neighborhood is the best alternative to service an additional 52 private hangers and ARFF emergency vehicles?

It is our belief that this plan is flawed as it is present on so many levels, and I am shocked that it is even under consideration by the Monterey Regional Airport.

It is also our belief that if the Executive Director and board think we are going to let this happen...then they are sadly mistaken!

#58  
cont.



Not even a pandemic will stop our protest. It is illogical and impractical to believe that the routing of additional traffic and emergency vehicles through our neighborhood is the best alternative. We would sincerely hope and respectfully request the FAA delay a "findings of NO significant impact" decision until a more in-depth analysis is made for the ARFF relocation.

#58  
cont.

Sincerely,

Harry Christensen



Subject: We object to the proposed re-routing of the North Side Access Road from Del Rey Oaks through the Casanova Oak Knolls Neighborhood

April 6, 2020

We are writing to **strongly object** to the proposed re-routing of the North Side Access Road from Del Rey Oaks through the Casanova Oak Knolls Neighborhood, as part of the “PROPOSED AIRFIELD SAFETY ENHANCEMENT PROJECT FOR TAXIWAY “A” RELOCATION AND ASSOCIATED BUILDING RELOCATIONS”. This proposed change results in worse and more significant impacts from the project, both in terms of traffic and public safety, and is clearly not in-line with the original proposed plan or the findings of the EIR for the proposed project (<http://montereyca.airportstudy.com/environmental-assessment/>). We urge the Monterey City Council to take every action possible to reject this proposed change on behalf of the residents of Monterey.

#59

We support the letter submitted by Mayor Clyde Roberson to the Monterey Regional Airport on April 7, 2020 and thank the City of Monterey Staff for such a careful, thorough, and well researched evaluation of the proposed change to the project. We agree with all of the major points raised by the City of Monterey in the letter of April 7. We request that the City of Monterey consider legal action, if necessary, to ensure that the FAA delays a Finding of No Significant Impact (FONSI), or reject the FONSI finding as unsupported by the evidence presented in the EIR.

The proposed project would create 51 new hangers on the north side and would also move the Aircraft Rescue and Fire Fighting facility to the north side of the airport. The original FAA determination was that the environmentally preferred alternative was to route the North Side Access Road through Del Rey Oaks. The original design was that the access road would pass through parcels in Del Rey Oaks that the Monterey Regional Airport already owns and/or through light industrial areas, but not directly through any residential areas in Del Rey Oaks or areas with significant pedestrian traffic. The proposed change would route the additional traffic from the proposed project directly through a neighborhood, passing immediately in front of homes, front yards, parks and sidewalks where children are playing and people are walking. It would also route emergency vehicle traffic and associated siren noise directly through a residential neighborhood.

#60

We understand the concerns and objections raised by the City of Del Rey Oaks. However, if the proposed project would create traffic and noise impacts that are unacceptable for light industrial areas in Del Rey Oaks and Highway 218, then a Finding of No Significant Impact cannot be justified, the No Action Alternative should be selected and the project should be canceled. Routing the traffic through the Casanova Oak Knolls Neighborhood to access North Fremont Street or Garden Road, which are already subject to heavy and growing traffic, would result in much more significant impacts than the original plan which has now been rejected by the City of Del Rey Oaks. Again, if these impacts were significant enough to be rejected by the City of Del Rey Oaks, then the EIR is flawed and a Finding of No Significant Impact cannot be justified and the EIR must be rejected.

We would also note that there are significant deficiencies in the traffic study for the EIR. The basis for the estimated reduction in daily vehicle trips reported in the EIR on p. 4-68 is flawed and contains numbers that are highly likely to be biased. The estimates for the vehicle trips for the current landscaping business are based on a single week of traffic measured on Sept 21-27, 2019, which is one of the busiest periods for this business. In contrast, the vehicle trips for the existing hangars and ARFF were measured from Nov 1 – Dec 31, 2016, which is one of the slowest periods of use for these facilities. To provide an accurate measure of relative vehicle trips, data must be collected at the same time for all facilities and for multiple weeks in multiple seasons.

#61

Finally, after years of review and discussion with Del Rey Oaks, the change in this decision without adequate time for public review and comment is outrageous. The draft EIR is hundreds of pages long and no time has been allocated for public meetings with the residents of the Casanova Oak Knolls neighborhood after the changes were announced. The fact that this is being done during a pandemic crisis, when many CONA residents are busy taking care of children while working remotely or struggling to adapt to loss of employment, and all public meetings must be held virtually, is unreasonable and unacceptable.

#62

We thank Mayor Roberson for his letter to the Monterey Regional Airport on this topic. We urge the Monterey City Council to take every action possible to reject this proposed change on behalf of the residents of Monterey.

Yours sincerely,

Forrest Melton and Kristine Tarozzi

[Redacted]

----- Forwarded message -----

From [Redacted]

Date: Tue, Apr 7, 2020 at 9:21 AM

Mr. La Pier,

I live in the Casanova Oak Knoll neighborhood and as a retired firefighter I'm very concerned on your plan to move the Airport Fire Dept. to the north side of the airport's runway. Having the Airport Fire Dept. respond through the Casanova Oak Knoll neighborhood would make for a poor response plan because of the close proximity of the current Montecito Fire Station. Why are you willing to ignore the airport's adopted EIR that states using Airport Rd produces unacceptable fire response times by up to 8 minutes!

#63

Under your proposed plan the Hwy 68 corridor/Ryan Ranch response times would increase dramatically putting the public's safety at risk. Mayor Roberson's letter to you clearly points out alternatives to your plan that do not put the public at risk such as a building site on the south side of the runway for the airport's fire station. Why would you move forward with this plan knowing the risks to the public? This has me very concerned, which brings up other concerns such as what other guidelines are you not following?

Thank you,

Jon Selbicky

The Airport is attempting to change its proposed future access to emergency services from what was described in the originally adopted Airport Master Plan. By moving the Airport's fire station to the north-side of the Airport and no longer pursuing the road through the industrial area of Del Rey Oaks, there will no longer be speedy access to Highway 68 and high fire hazard zones. Reductions in service will impact the future security of the airport, area residents, and businesses. Regularly occurring emergency and general non-aviation access through the Casanova Oak Knoll Neighborhood (CONA) is unacceptable as it is inconsistent with the City of Monterey's General Plan. The excellent staff report summarizes these many inconsistencies very clearly. Monterey Vista Neighborhood joins CONA in supporting the proposed measures before the Council and any and all additional actions the City may adopt to stop this ill-conceived plan. Access through residential neighborhoods or which increase emergency response times should never have been considered an alternative. Thank you.

#64

Susan Nine, MVNA President

Dear council & staff  
Please OPPOSE this from happening in a residential neighborhood as did Del Rey Oaks for the very reasons they opposed it.  
Every council member should treat this as if it's being proposed in their own neighborhood not just in the very underrepresented side of the city.

#65

Best Regards,  
Esther Malkin



March 31, 2020

City of Monterey Planning Department and City Council

Subject: New construction by the Monterey Peninsula Regional Airport and access through CONA.

In Regards to any Council discussion on this topic. Let me just say, the Airport carried out a public relations campaign the resulted in pitting the residents of Del Rey Oaks against the CONA part of Monterey regarding increasing use of the south side of the airport that will adversely effect CONA, city fire response and traffic into the North Fremont area. Since I discussed and contributed to the materials used in CONA

#66

President Richard Ruccello's letter and, in an effort to save reading time for the council, I concur with all the issues in his letter. I am glad other neighbors submitted their opinions as well. Thank you.

#66  
cont.

Mike Brassfield

Monterey Resident.

----- Forwarded message -----

From [REDACTED]

Date: Mon, Apr 6, 2020 at 11:15 AM

As a resident of Casanova Oak Knoll neighborhood, I would object to the Airport District's alternate change to use Airport Road. It will bring more traffic and speeding issues to our neighborhood, specifically Airport Road and Ramona Ave. The Airport District spent taxpayers funds to access Canyon Del Rey Blvd (SR 218), and now Del Rey Oaks has restricted access. Shouldn't this issue have been settled before in the EIR, not later!

#67

Greg and Claudia Heydeman

I strongly object to the airport using Airport Road through the CONA neighborhood to access a northern expansion of the airport. The increased truck and car traffic speeding through Airport Road will endanger pedestrians and cause noise pollution. As I walk on Airport Road for my exercise now I see lots of commercial trucks and cars speeding to get to their businesses on airport property. With this proposed expansion the problem would only get worse. Also I anticipate that the traffic through Casanova street will increase as well with the same problems through another residential neighborhood.

I have no trust in the airport to address these problems since they have not been good neighbors in the past. We have small aircraft flying low over our house continuously making loupes over to the airport and returning to buzz our house. We have complained but with no avail and I would suggest that there would be the same arrogance and lack of response by the airport to mitigate problems causes by a northside expansion. There are alternatives but the airport has mismanaged it's deadline and wants to push this proposal through.

#68

I ask the Council to oppose the use of Airport Road through the CONA neighborhood

Kenneth Bear  
[REDACTED]



----- Forwarded message -----

From [REDACTED]

Date: Sun, Apr 5, 2020 at 10:57 AM

Ladies and Gentleman,

I am writing in opposition of the airports proposal to utilize Airport Road through the Casanova Oak Knolls neighborhood as a single access road.

As a home owner and resident of City of Monterey, I understand that the airport already owns two parcels with access to Hwy 218. I believe that this option needs further review and evaluation to minimize expense and disturbance by this project. It appears that the City of Del Rey Oaks , in restricting access to SR218 , is treating it as a Parkway instead of a Highway. To my knowledge there is are no traffic counts indicating that SR 218 cannot bear the additional traffic from the 52 private hangers and the ARFF emergency vehicles.

#69

Our neighborhood(Casa Nova Oak Knolls) has additional high density projects in process. You cannot accurately assess the traffic on Airport Road today or in the future without taking these projects and the proposed movement of Airport Fire to the Northside.

#70

Finally, as a healthcare worker I understand the value of timely EMS response to those in need. An anticipated delay in response time due to the proposed traffic route should seriously be enough to stop this option in its tracks. An additional 5-8 minute delay could mean the difference of life and death for those in neighborhoods further away than mine. I am concerned that with the pandemic at hand, those that may be affected by this significant increase in response time may not have the where with all to comment at this time. As our representatives , I ask that you speak for them and for me and vote NO on moving forward with the Airport's alternative 2, Airport Road.

#71

Ann Kern  
[REDACTED]

----- Forwarded message -----

From [REDACTED]

Date: Sun, Apr 5, 2020 at 12:03 PM

Dear City Clerk,

How are you today? I am writing this email with comments regarding any through traffic through my neighborhood. Buying in my location, I was aware of the airport noise, but I liked the idea of NO thoroughfare of cars in route to the airport through my neighborhood. Now, you seem to be proposing that routes are being thought of, to enter the airport at all different entries. This is unforgiveable and demoralizing. The quietness and safety of no traffic and peacefulness is why most of us bought houses here and now you want to disregard all of our privacy? I don't think this is right. Imagine if this was your neighborhood.

#72

With all due respect, please reconsider your decision.

Thank you,

Dan Cutler

Casanova Casanova~Oak Knoll Neighborhood.

----- Forwarded message -----

From [REDACTED]

Date: Sun, Apr 5, 2020 at 12:15 PM

I am writing this email as an objection to the Monterey Airport District plan to use an alternative access for the new development through Del Rey Oaks using Airport Road as access. The Airport already has a plan to use Highway 218 to reach the new development but The City of Del Rey Oaks rejected that plan. Using Airport Road as an alternative is a bad idea. The use of Airport Road when they already have access using Highway 218 creates more traffic in the neighborhoods of the Casanova Oak Knoll area; it also causes emergency equipment such as fire trucks, police vehicles and ambulances to take a longer route which adds about 8 minutes additional response time. There is not a good reason proposed as to why Highway 218 cannot be used; Del Rey Oaks in their objection refer to Highway 218 as a Parkway rather than a highway which isn't the case. There are no traffic counts within the General Plan and no information indicating that SR218 could not bear the additional traffic from moving the private hangars. After living in the Casanova Oak Knoll neighborhood for over 41 years, I can say that the additional traffic noise on Airport Road would be a disaster in our quiet neighborhoods and Airport Road is just that: a road, not a highway, it was not designed

#73

#74

to take the additional traffic that would be caused by emergency vehicles traveling on it constantly. This plan was rejected by the City of Del Rey Oaks and it should be rejected by the City of Monterey as well; as it was the last time it was proposed there is no good reason to use Airport Road instead of Highway 218.

#74  
cont.

The Airport District began this project by purchasing land to use on this project with a great expense to tax payers. The District also obtained a grant from the FAA for this project but there are deadlines that must be met in order to continue with it, it would appear that the Airport District is nervous about losing their funding and explaining to taxpayers why they spent money for a project that hadn't been approved yet.

#75

On a personal note, when we are in the spirit of all of us working together to get our city through the worst disaster in the Countries history, the Coronavirus pandemic, it is unfair to ask the citizens of Monterey to address this issue right now. It seems like the airport district has chosen this time because they know we are all distracted and are hoping that we won't object to their plan. Shame on them, I thought we were all working as a team for the good of Monterey.

Joan Reta

----- Forwarded message -----

From: [REDACTED]

Date: Sat, Apr 4, 2020 at 8:48 PM

We have lived very near the airport for close to 30 years. I spent 37 years in the Navy much of that time around Naval aviation. So I understand the noise impact. What upsets me most is that ALL decisions about the airport are made from Sacramento by people who may never have been to the Monterey Peninsula. The local Airport Board answers to Sacramento NOT to any local authority even though the Board has local members.

#76

----- Forwarded message -----

From: [REDACTED]

Date: Mon, Apr 6, 2020 at 10:41 AM

We have a residence in the CONA neighborhood and are strongly opposed to the use of Airport Road as the primary access route for the new development on the north side of the airport. The thought of increased traffic, especially emergency vehicle traffic, through our residential, neighborhood streets is extremely troubling. These residential roads are not designed for heavy traffic flow, especially not emergency vehicles that need to travel at increased rates of speed.

We already deal with congested traffic during the numerous fairground events. What would happen if fire engines were trying to navigate through this as well?

It seems that there are more appropriate routes to Highway 68 or State Route 218, that would not need to maneuver through residential areas. We don't understand the reasoning behind eliminating these options.

We are also troubled by the timing of this action, during a period when the public cannot assemble to voice their opposition to such a distressing plan.

Please listen to us and do not use Airport Road.

Thank you,

Dorothy Baumann  
JB Borris

#77

----- Forwarded message -----

From: [REDACTED]

Date: Mon, Apr 6, 2020 at 11:08 AM

I am voicing my opinion against the proposed development at the airport. If there is a consensus among people that highway 218 cannot handle the additional traffic, then there should be an even greater consensus that airport road can not handle the traffic. Sending traffic through a neighborhood instead of out to a highway is plain ridiculous. I can't even believe it's under consideration. I am in complete opposition to this.

John Besseling

[REDACTED]

#78

**Citizen Comment Form**

Comments As residents and home owners on Lerwick Drive, we support all City efforts to strongly oppose the Airport expansion as it relates to traffic and noise in the neighborhood, and the new fire station location gives the City no reason to continue to provide fire services to the Airport. We hope the City will sue if necessary to protect it and its residents from this rushed, inappropriate & permanent change to the neighborhood and North Monterey.

Fullname Eric Bernhard  
Email [REDACTED]  
Address [REDACTED] Monterey, CA 93940 United States|US

#79

----- Forwarded message -----

From: **Mike Rausch** [REDACTED]  
Date: Sun, Apr 5, 2020 at 4:59 PM

**Subject: Public comment for Item 14 - City Council Meeting April 7<sup>th</sup> 2020**

- I strongly support the Staff Report prepared by Community Development for Agenda Item 14.
- I support Attachment 1, proposed City of Monterey letter to the Monterey Regional Airport.
- Please - contact the FAA and request that the flawed public review process for the DEA be delayed until 30 days after the lawful orders restricting public interaction, amongst all risk groups, have been lifted. Even a May 1<sup>st</sup> deadline is unrealistic considering today's circumstances.

#80



----- Forwarded message -----

From: [REDACTED]

Date: Sun, Apr 5, 2020 at 2:59 PM

We would like to emphatically urge you to not allow the Airport's continued growth and development to further negatively impact the Casanova Oak Knoll Neighbor (CONA). Please deny the Airport's plan to use Airport Road as an access route for the future development of the North side of the runway.

The negative impacts of this plan to Monterey and CONA are numerous. They range from a relocation site for the Fire Station that increases response times to much needed areas, the potential impact and termination of small businesses in the North Side Industrial Park, and increasing traffic on our beautifully repaved family friendly neighborhood streets. This development plan is poorly timed during the order to shelter in place and seems to be rushed through in order to take advantage of grant money. No decisions of this magnitude should be rushed. CONA has a well documented neighborhood plan which this plan flies in the face of. The Airport has been a cooperative neighbor in the past, but their recent push to grow beyond themselves has cast them as the ugly neighbor. Why this plan? Why now? This decision could have negative repercussions to our fair CONA neighborhood, as well as the surrounding ones, far into the future. Development decisions should not be rushed through at any time, least of all while we are ordered to shelter in place.

The Airport has other options for access that it needs to go back to the drawing board and further explore, if growth and development in the name of "safety" are truly its goals. Airport Road access is not a safe solution. This alternate plan indicates that the Airport has abandoned the original plan of creating an access passage through Del Rey Oaks to Highway 218. This was because the residents there raised their voices in an emphatic "No!" We also raise our voices in an equally emphatically "No!" We say "No!" to trampling on CONA and it's carefully crafted Neighborhood Plan to maintain our current way of life. We say "No!" to an ugly neighbor who pushes their own agenda (at the worst possible time) with the greatest potential negative effect to our neighborhood and it's local businesses. We say "No!" to hasty decisions based on Grant money timelines. We say "No!" and we explore you, the members of the City Council, to say "No!" for us tonight.

Thank you for your time and attention,

Wendy and Mark Milligan  
[REDACTED]

#81

----- Forwarded message -----

From [REDACTED]

Date: Sun, Apr 5, 2020 at 1:21 PM

Re: Comment regarding Monterey Regional Airport Draft Environmental Assessment for Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations

Dear Monterey City Council Members,

I am a Monterey citizen who has lived in the Casanova-Oak Knoll (CONA) neighborhood for 15 years. I am deeply troubled by the Monterey Airport's proposed development on the north side of the airport, and specifically the revised plan that will negatively impact the CONA neighborhood by greatly increasing vehicular traffic and noise.

#82

I am troubled by this proposal for two reasons. First, the timing of this proposed change is indefensible. Our country is in the midst of a horrible pandemic, and the airport has chosen this time to push through changes to this development plan that will have serious consequences for my neighborhood. This is not the appropriate time to make any such changes to the plan. Our citizens are under excessive stress due to the pandemic and therefore are less inclined to voice their concerns to this proposal as they are focused on the current public health crisis.

Second, the CONA neighborhood already endures a disproportionate share of aircraft noise due to our close proximity to the most common aircraft departure route from the Monterey Airport. The City and Airport have already failed miserably in addressing concerns from the CONA neighborhood about safety and noise related to the airport. Specifically, the Airport and City have not addressed the continued problem of general aviation aircraft initiating right turns immediately after takeoff and flying at low altitude directly over the CONA neighborhood, instead of flying strait off the end of the runway as stipulated by noise abatement guidelines. Not only does this practice by general aviation result in an undue increase in noise across the CONA neighborhood, but is also a safety concern. Now, with his latest proposal, the CONA neighborhood will be subjected to the additional burden of increased vehicular noise on Airport Road, and also increased noise due to sirens from departing fire engines. In short, I feel the CONA neighborhood already endures undue noise and safety burdens related to the airport, and this plan will unnecessarily add to our burden.

#83

I will be retiring from my job with the United States Government next year. My hope was to remain living in my home in the CONA neighborhood after retirement. However, if this latest airport plan is allowed to proceed, I will likely move to a different city, one in which I can enjoy peace and quiet and not be subjected to undue noise and safety concerns.

#83  
cont.

Please vote no on this proposal. Thank you for your consideration.

Duane Dykema  
[REDACTED]

----- Forwarded message -----

From: [REDACTED]  
Date: Sun, Apr 5, 2020 at 7:18 PM

You say it is only a access road. That is not true, the increase of traffic that will this idea will cause is unbelievable. This is a true neighborhood not a industrial park. I have lived in this neighborhood for the past 40 years and want to keep it as such. The airport should have this access road come of highway 68 or go through an industrial park as planned.

#84

Denise Franco

----- Forwarded message -----

From: [REDACTED]  
Date: Sun, Apr 5, 2020 at 4:44 PM

As residents of Casanova Oak Knoll neighborhood, we offer the following comments with regard to the FAA EA report.

We understand that the airport already has access to HWY 218 using two of the following parcels:

259021002000

012601033000

012601034000

In addition, the DRO General Plan established 23 years ago is 13 years overdue for the recommended ten-year updates.

#85

The DRO General Plan does not match circulation goals, does not define highways in the way CA DOT defines highways, and does not contain traffic counts that would indicate SR 218 could not bear additional traffic from the private hangars.

Moving Airport Fire and using Airport Road also increases Fire response times by 5-8 minutes as indicated by the adopted EIR.

Additionally, only giving our city a 30-day extension amid a global crisis is not appropriate for such a decision that would have an enormous affect on CONA residents.

In the strongest terms as residents of Casanova Oak Knoll we object to diverting airport traffic through a road suited for residential use while other safer, more appropriate alternatives are at the airport's disposal.

Sincerely,

Alan and Sharon Sparkman

----- Forwarded message -----

From: [REDACTED]

Date: Sun, Apr 5, 2020 at 1:07 PM

I live on Lilac Street in CONA and from what I understand the Airport is increasing the amount of traffic to and from the north side due to additional facilities and not developing a Del Rey Oaks route in/out, although the Airport says the traffic will actually decrease.

I'm wondering if there is any way to hold the Airport to their prediction/statements? Something like; if the traffic going through CONA (Airport, Ramona and Casanova) increases by more than 20% (that number is just a suggestion at this point) in the first 6 months (same, a suggestion) after the additional facilitates are in place then the Airport District would be required to put another route in place.

I must admit I have not read all of the documents in detail so if this is already in place, please forgive me.

Thanks for listening/reading and considering this idea.

Louis Algaze

#85  
cont.

#86

----- Forwarded message -----

From: [REDACTED]

Date: Sun, Apr 5, 2020 at 12:38 PM

Honorable Tamara A. Swann, FAA, et al:

I am a resident of the City of Monterey who lives several miles from the Monterey Regional Airport (MRA) who has never attended a meeting of the Casanova/Oak Knolls Neighborhood Association (CONA). If the FAA and the MRA proceed in the award of public funding for the development proposed; federal, state, regional or local, before the COVID19 emergency restrictions on public meetings are lifted and public meetings return to normal, that would be a fundamental denial of my rights to public participation and Freedom of Assembly.

I first became aware of FAA/MRA plans to dramatically increase traffic through a Monterey neighborhood in which I do not live via local newspaper articles in the past few weeks. I did seek to inform myself about the underlying facts and issues this would present by contacting acquaintances who do live in the neighborhood directly affected. I immediately became aware that I was not free to go to the neighborhood affected to meet with those residents and to obtain their input. I am not allowed to meet with them to prepare a response or objection to FAA/MRA conduct.

I am not allowed to attend the regular session of the Council Meeting at which this item will be taken up.

Ms. Swann, please take a step back. Of necessity, the public participation of all of us is restricted to a clearly unconstitutional degree which can only be justified as a temporary means to prevent the loss of innocent life. For any public institution in my Country, federal, state, regional or local, to award millions of dollars over the objection of those of us prevented from Assembling to be heard and to protest, would be a gross over-reach of authority.

Respectfully submitted,

MIKE PEKIN  
[REDACTED]

#87



----- Forwarded message -----

From: [REDACTED]

Date: Mon, Apr 6, 2020 at 10:23 AM

We have lived on Casanova Avenue for the last thirteen years and strongly oppose the plan to exit the north side of the airport to Fremont via Airport Road. This would greatly impact the already busy traffic on Casanova to Fremont. If Del Rey Oaks says NO, so do the residents of CONA. This plan is ill devised and short-sighted. Please don't further disturb the residents of this neighborhood. Thank you.

Richard Jensen  
Jaimem Rosario

#88

----- Forwarded message -----

From: [REDACTED]

Date: Mon, Apr 6, 2020 at 10:33 AM

I write today to express my objection to the airport using Airport Road through the CONA neighborhood in its planned expansion of the airport.

1. The airport already owns two parcels of land that connect with highway 218, a State Road. Connecting to a state road would be a more logical route as opposed to a neighborhood street.
2. If allowed to move forward with the current plan, moving the fire station to the north side will add precious time to responses and will add emergency traffic and siren noise to a quiet neighborhood.
3. It appears that the airport may have published less than truthful "facts" related to traffic impacts. The airport has broken trust with the CONA neighborhood in the past, making it difficult to trust their PR onslaught at this time.

#89

I encourage the Council to oppose the use of Airport Road through the CONA neighborhood.

Sandra Bear

[REDACTED]

TO: CITY CLERK MONTEREY FROM: JAMES GILLILAND [REDACTED] DATE: 4-5-2020 SUBJECT: Public comment council meeting 4-7-2020 - ARFF relocation

As residents of the CASA NOVA OAK KNOLL neighborhood, we are strongly opposed to the relocation of the ARFF services building to the north side of the airport. The site chosen for the relocation of the ARFF building onto the north side of the airport would potentially intensify traffic in our CASA NOVA OAK KNOLL neighborhood. In addition, such a plan is NOT CONSISTENT with our understanding of the

#90

neighborhood plan as it existed when we purchased our home. Other parcels have already been acquired by the airport .

These parcels properly designed would allow necessary access for ARFF to operate with much reduced response times that could be critical in an emergency. A north side location significantly increases this emergency response time. It is clear that a safer alternative is available and can be created in an already industrial area rather than a less efficient path through a predominately residential neighborhood. This AIRPORT RD plan is also inconsistent with the CITY OF MONTEREY GENERAL PLAN as we understand it. We adamantly oppose any additional airport related traffic being unnecessarily introduced In our residential neighborhood when several alternatives plans allow access through an established industrial area. JAMES GILLILAND [REDACTED]

#90  
cont.

April 6, 2020 Public comment for Council mtg. 4/7 - Item 14 I am strongly opposed to the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation and Associated Building Relocations. I have lived on the Monterey Peninsula for 25 years and have lived in Monterey proper for 7 years. I am currently a resident and homeowner in the Casanova Oak Knoll neighborhood. Casanova Oak Knoll is a very cohesive, friendly neighborhood that would be negatively affected by fire vehicles responding day and night. I have tried to educate myself on the issues, although with public comment being opened only on March 24th, it has been challenging to assimilate the necessary information. The Casanova Oak Knoll Neighborhood Plan ensures this neighborhood retains its current family and community attributes. The proposal violates several of the adopted CONA policies. Likewise, the Monterey City General Plan was developed to promote the best interests of those who live and work in Monterey. This proposal violates numerous essential policies of the Monterey City General Plan. It appears that alternatives that have been suggested not only are consistent with the above policies, but are also functionally superior. It also appears that a looming forfeiture of funds may be fueling the decision rather than valid analysis and true desire to obtain public impact. While I am not aware of the exact legal process that is required for approval of a public project such as this, I do know that the legal requirements are designed to elicit informed input and to establish the true impact of a project, regardless of the technical compliance. Here, it does not feel like the spirit of these requirements is being honored.

#91

Sincerely, Barbara Lind Hirst

From: [REDACTED]  
To: [cityclerk@monterey.org](mailto:cityclerk@monterey.org); Planning; Richard Ruccello  
Subject: FAA EA Airport  
Date: Sunday, April 5, 2020 4:59:51 PM

Dear city leaders, I've lived in Monterey since the 60's and the last 30yrs in the beautiful CONA neighborhood. I've watched the development of the north side of the airport continue to expand unchecked for 3 decades now as my property is directly against the boundry.

In the 90's the airport road entrance gate was closed to the public via being automatic with an entry code for access. Traffic was mild at that time, and now Airport Rd, Casanova, Ramona, and Euclid Street have become major thoroughfares. It is ironic that after all the "traffic calming" measures you've implemented for us, that you would turn around and try to ram anymore light industrial use vehicles onto our once peaceful streets. Not to mention the recently wasted millions of dollars spent on the ridiculous never used bike path to nowhere. That was an attempt to restructure N.Fremont into a different future look of business's with pedestrians and cyclist's all coexisting with vehicles. Tell me exactly how all this new traffic on airport road would help with that vision. If you move ahead with this option I'll have no choice but to lobby for the closure of Euclid St at Airport road to any North side traffic, similar to what happened with Stuart Ave.

In my opinion, you have two major hwys in 218 and 68, that boarder the airport which are much better options. You were bamboozled by the residents of Del Rey Oaks. Del Rey Gardens Rd is certainly the most practical option only impacting a very small % of residents in the condo complex there. An entry road off of 218 would'nt affect any residential portions of DRO proper in any way.

It is a shame under our current situation that we can't show our faces to voice our disgust with your plan. Please do the right thing and build your entry road from one of the hwys and not through our front yards. Thank you, Mike Rausch

#92

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From: [REDACTED]  
To: [cityclerk@monterey.org](mailto:cityclerk@monterey.org); Planning; CONA  
Subject: Public comment for Council mtg. 4/7- Item 14  
Date: Monday, April 6, 2020 10:16:43 PM  
Attachments: [Melton North Side Access Road Comment.docx](#)

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Dear City Clerk of Monterey,

Please relay the comment below to Mayor Roberson and the Monterey City Council Members related to Item 14 on the agenda for April 7. I have included a comment below for the meeting, as well as a letter to the City Council on this topic.

=====

April 6, 2020

Dear Mayor Roberson, Council Members, and Mr. Ulsar,

We are writing to **strongly object** to the proposed re-routing of the North Side Access Road from Del Rey Oaks through the Casanova Oak Knolls Neighborhood, as part of the “**PROPOSED AIRFIELD SAFETY ENHANCEMENT PROJECT FOR TAXIWAY “A” RELOCATION AND ASSOCIATED BUILDING RELOCATIONS**”. This proposed change results in worse and more significant impacts from the project, both in terms of traffic and public safety, and is clearly not in-line with the original proposed plan or the findings of the EIR for the proposed project (<http://montereyea.airportstudy.com/environmental-assessment/>). We urge the Monterey City Council to take every action possible to reject this proposed change on behalf of the residents of Monterey.

We support the letter submitted by Mayor Clyde Roberson to the Monterey Regional Airport on April 7, 2020 and thank the City of Monterey Staff for such a careful, thorough, and well researched evaluation of the proposed change to the project. We agree with all of the major points raised by the City of Monterey in the letter of April 7. We request that the City of Monterey take legal action, if necessary, to ensure that the FAA delays a Finding of No Significant Impact (FONSI), or reject the FONSI finding as unsupported by the evidence presented in the EIR.

In particular, we would highlight that there are significant deficiencies in the traffic study for the EIR as noted in the letter of April 7. The basis for the estimated reduction in daily vehicle trips reported in the EIR on p. 4-68 is flawed and contains numbers that are highly likely to be biased. The estimates for the vehicle trips for the current landscaping business are based on a single week of traffic measured on Sept 21-27, 2019, which is one of the busiest periods for this business. In contrast, the vehicle trips for the existing hangars and ARFF were measured from Nov 1 – Dec 31, 2016, which is one of the slowest periods of use for these facilities. To provide an accurate measure of relative vehicle trips, data must be collected at the same time

for all facilities and for multiple weeks in multiple seasons.

We also strongly object to the hurried nature of this change in the midst of a statewide shelter-in-place order and a national crisis, and the fact that time has not been allowed to hold public meetings with the residents of the Casanova Oak Knolls neighborhood after the changes were announced.

#93

Again, we thank Mayor Roberson and the City of Monterey for the letter to the Monterey Regional Airport on this topic. We urge the Monterey City Council to take every action possible to reject this proposed change on behalf of the residents of Monterey.

Yours sincerely,

Forrest Melton and Kristine Tarozzi



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APR 06 2020

MONTEREY PENINSULA  
AIRPORT DISTRICT

**From:** [REDACTED]  
**Sent:** Monday, April 6, 2020 3:07 PM  
**To:** Chris Morello  
**Cc:** 'Richard Ruccello'  
**Subject:** Subject: Environmental Assessment for Proposed Airfield Safety Enhancement Project

Hello Chris Morello,

Please accept my comment for the propose airport enhancement. I object to the use of Airport Road to be consider as the main access for your development as proposed in the, Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations.

My home is located in CONA, and I will be happy with a decrease in ATD by 25%, but very unhappy with the 20% or less as is stated in the proposal. Removing an RV Storage business will not balance out the increase in ATD from millions of dollars of traffic for construction, resulting in greater hangar sq ft, more tenant buildings, and maybe, but most like not the relocation of a towing services . I believe traffic will increase way beyond your estimate. So I am sticking with the ATD decrease of 25%, cut traffic back and CONA is an even better place to live. DRO must open up.

#94

The FAA has not been able to negotiate with DRO to open traffic to pass through their industrial park onto Hwy 218. DRO is a 20<sup>th</sup> from the bottom in population in California, less than 2,000 residence and they stopped the FAA from doing the reasonable thing for Monterey County residence. You ask CONA to bear the burden of airport related traffic to our detriment. What is wrong with the FAA! Do you see that CONA is redeveloping, we have a new bike lane, we have blub-outs and traffic islands to make our neighborhood walkable, social, and safe. The point of which is we want to enjoy our recreating in our community, we will not tolerate all the public health problems which come with traffic congestion and the loss of calming which CONA has spent years planning and waiting for.

Airport Road will be a health hazard, it will only add to miserable traffic during fairground events, commute and hotel/small business access. Homes along Airport Road will suffer loss of property value, quality of life and increase risk of injury and certainly loss of health. Airport Road cannot sustain this explosive development with harming CONA's active, involved citizens.

#95

How can you think that forcing car/truck traffic from the airport down thru neighborhood streets is better than, routing traffic thru DRO into an already industrial park on highway 218 then out to hwy68 or hwy1 isn't the right answer. Who is impacted by that? DRO cannot refuse to share the burden of this growth, so go back and figure out how to get them onboard.

Do not shove this into CONA, we will fight this because it is the right thing to do.

I thank you for doing the ethical thing, and if you can't see it then I suggest you take a look at truck routes through the area. There is a reason they follow those streets, it is coordination for fire, police, emergency vehicle management, it is for communting and cycling and pedestrian traffic. Your proposal disrupts and makes chaos for CONA and many other parts of Monterey. This link will show you truck routes. They exist for a reason.

<https://www.monterey.org/Portals/0/Maps/Truck-Route-Street-Classes-Map.pdf>

Thank you,  
Lisa Duggan

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MAY 01 2020

MONTEREY PENINSULA  
AIRPORT DISTRICT

**From:** [REDACTED]  
**Sent:** Friday, May 1, 2020 4:54 PM  
**To:** Planning  
**Cc:** [REDACTED]  
**Subject:** Comments on Airport Draft EA

Attn: Chris Morello, Deputy Director of Strategy and Development

The extensive work proposed for the airport will cause long-term noise for all residents who live nearby and on the surrounding hillsides and cause severe sleep disruption for many if it is undertaken at night. A full environmental impact review must be undertaken on this project.

The last time the airport district conducted a large work project, the work was done at night. Throughout the night the roar of trucks and the beeps when they backed up could be heard. The low frequency sound came through windows and walls, and interrupted sleep. It was like torture.

This project would severely impact life for many residents of Monterey. This type of environmental impact on many "sensitive receptors" can't be mitigated.

Sincerely,

Nina Beety

#96

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**From:** Brown, Marlana (CIV) <marlana.brown@nps.edu>  
**Sent:** Friday, May 1, 2020 4:23 PM  
**To:** Chris Morello  
**Subject:** NSAM Response: Airport EA Taxiway Relocation/Master Plan Project  
**Attachments:** 11000 N4\_090 Monterey Airport Taxiway A Project 5.1.2020.pdf

Chris,  
Attached is the official Naval Support Activity Monterey response to the Taxiway A and other related buildings Environmental Assessment.

If you have questions, please let me know.

Have a good, safe weekend!

Marlana Brown  
Naval Support Activity Monterey  
831.656.2475

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DEPARTMENT OF THE NAVY  
NAVAL SUPPORT ACTIVITY MONTEREY  
271 STONE ROAD  
MONTEREY CA 93943-5189

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MAY 01 2020

MONTEREY PENINSULA  
AIRPORT DISTRICT

IN REPLY REFER TO:

11000

Ser N4/090

MAY 1 2020

Mr. Mike LaPier  
Monterey Regional Airport  
200 Fred Kane Drive, Suite 200  
Monterey, California 93940

Dear Mr. LaPier:

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED AIRFIELD SAFETY ENHANCEMENT PROJECT FOR TAXIWAY "A" RELOCATION AND ASSOCIATED BUILDING RELOCATIONS AT MONTEREY REGIONAL AIRPORT

Thank you again for the opportunity to comment. As noted in our previous response to the Draft Environmental Impact Report (EIR) regarding the Monterey Peninsula Airport Master Plan, the Safety Enhancement project for Taxiway "A" relocation and associated building relocations is generally compatible with military operations. Upon review of the Draft Environmental Assessment (EA), however, Naval Support Activity Monterey (NSAM) requests clarification on an inconsistency between that which is proposed in the EA and the previously approved EIR and Airport Master Plan.

The Final EIR and Master Plan Alternative 1, approved November 26, 2018, refers to a short-term project component: "Construct a new "north side" road, which would extend from Del Rey Gardens Drive in Del Rey Oaks (off Highway 218) to the northeast side of the Airport. The new "north side" road would provide additional access to the north side of the Airport and would discontinue access through the CONA neighborhood for areas east of Gate 22." (P. 1-3). In the Draft EA, however, the Proposed Action illustrated in Exhibit 2C, appears to eliminate construction of the new "north side" road and continues traffic via Airport Road, consistent with the EIR Alternative 2. Attached are both Exhibits 2C and 2K from the EIR showing said "north side" road as well as the Draft EA's Exhibit 2C showing the same road now eliminated. Please clarify the discrepancy.

As previously stated in our October 30, 2018 response to the EIR, NSAM supports prioritization of the approved "north side" road which would direct traffic to SR-218 and away from both the NSAM Annex and the primarily residential CONA neighborhood.

#97

11000  
Ser N4/090  
MAY 1 2020

We appreciate the Monterey Regional Airport's efforts in working to provide quality regional air service options and facilities to our community. If you require additional information, please contact my Community Planning Liaison Officer, Ms. Marlana Brown at [Marlana.Brown@nps.edu](mailto:Marlana.Brown@nps.edu).

Sincerely,



R. A. WILEY  
Captain, U.S. Navy  
Commanding Officer

- Enclosures:
1. Initial response to EIR dated 30 October 2018
  2. EIR Exhibit 2C: Proposed Project
  3. EIR Exhibit 2K: Proposed "North Side" Road
  4. EA Exhibit 2C: "North Side" Road Alternatives



**COMMENT A3**



**DEPARTMENT OF THE NAVY**  
NAVAL SUPPORT ACTIVITY MONTEREY  
271 STONE ROAD  
MONTEREY CA 93943-5189

11000  
Ser N4/159  
October 30, 2018

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

Dear Mr. La Pier:

**SUBJECT: RESPONSE TO MONTEREY PENINSULA AIRPORT DISTRICT MASTER PLAN  
DRAFT ENVIRONMENTAL IMPACT REPORT**

Encl: (1) Development Notification Request Area  
(2) Noise Contours 2015 and 2035

Thank you for providing Naval Support Activity Monterey (NSAM, The Navy) an opportunity to provide comment regarding the Draft Environmental Impact Report (DEIR) associated with the proposed Monterey Peninsula Airport Master Plan. Upon review, the Master Plan and associated DEIR are generally compatible with Navy operations with a few noted exceptions.

1

**Non-Aviation Development**

The non-aviation development designation in the northwest portion of the airport could represent potential challenges to NSAM tenant operations. At a programmatic level, the "non-aviation development" in all alternatives presented is not addressed in a manner in which the Navy can provide specific comment. NSAM, however, requests notification as early in the process as possible, when specific projects are proposed in the northwest, non-aviation designation in order to provide feedback relating to design impacts. Design considerations of future non-aviation should include: building height, identification of constriction lay down areas, drainage and storm water run-off impacts, as well as any potential conflicts with underground infrastructure.

2

For example, any development, including specific types of landscape design, in the area adjacent to the Navy Annex, pictured in Enclosure 1 and marked by blue arrows, is requested to remain at least 20 feet or more from the Navy's property line as identified in the Department of Defense Unified Facilities Criteria O.10.5, parts 1,3, and 4:

3

"O.10.5 Clear Zones

*1. Unobstructed areas or clear zones [open areas] shall be maintained on both sides of the restricted area fences. Correspondingly, where exterior walls of buildings form part of restricted area barriers, an unobstructed area or clear zone shall be maintained on the exterior side of the building wall. Vegetation or topographical features that must be retained in clear zones for erosion control or for legal reasons shall be trimmed or pruned....Additionally, the vegetation should not be more than 8 inches in height....*

ENCLOSURE (1)

3. The outside clear zone shall be 20 feet or greater between the perimeter barrier and any exterior structures or obstruction to visibility.

3  
con't

4. Obstacles may exist within exterior and interior clear zones if they offer no aid to circumvention of the perimeter barrier and do not provide concealment..."

### Noise

Though the Master Plan is a facilities focused document, the Navy has concerns about future noise caused from anticipated increased operations. Appendix K, page K-19 indicates an increase in 65dB noise levels over Navy research facilities, though the Navy's property is indicated as a "Public" land use (see Enclosure 2).

4

These noise contour increases indicate minimal additional residence impacts, however, there is an immitigable external noise impact on the Navy Annex area. Additionally:

- The Navy's Annex area is an educational and research facility and should be addressed as such to be consistent with "Existing and Consolidated" operations maps found in Appendix K.
- Appendix K, page K-5 states "A majority of the departure tracks lead to the northwest and northeast. Runway 28L departure tracks turn to the northwest, following the airport's departure procedure." Moreover, Exhibits K-1 and K-2 of said Appendix indicate arrival and departure patterns directly over Navy property. Increased operations and thus an increase in Single Event Noise Exposure Levels (SEL) are a concern for the academic and research mission at NSAM.
- NSAM and its tenants routinely perform outdoor ceremonies, the majority ceremonial in nature, on the campus grounds. Anticipated increases in service to and from the airport, and thus directly over Navy property may prove to be disruptive and may require coordination in the future to establish and anticipate "quiet hours" if an increase in external noise goes unmitigated.

5

6

### The North Side Road

As evaluated in the DEIR Proposed Project, the North Side Road is not associated with a future construction date or associated funding. Additionally, with the relocation of General Aviation hangars to the north side of the Airport, significant and unavoidable impacts could occur with traffic. To avoid negative traffic impacts from future construction at the Airport, NSAM supports prioritization to develop a "north side" road connection to SR-218 as a priority to avoid unmitigated traffic impacts near both the research and educational facilities aboard the installation as well as impacts to the Cassanova Oak Knoll Neighborhood residential area.

7

### Cumulative Impacts

My staff recently had an opportunity to review a site plan for a notional storage facility on the airport's west side near existing storage facilities and directly adjacent to a long-term easement used for the Navy's Monterey Pines Golf Club. This facility is not addressed on a programmatic nor a project level in the DEIR and should be taken into consideration as a *reasonably foreseeable*, probable future project.

8

### Partnering Opportunities

The Department of Defense's Readiness and Environmental Protection Integration (REPI) Program is a key tool for protecting military missions by helping remove or avoid land-use conflicts near installations and addressing regulatory restrictions that inhibit military activities. The REPI Program is

9

administered by the Office of the Secretary of Defense (OSD) and is authorized by Congress through 10 U.S.C. § 2684a. NSAM is actively seeking partnership opportunities to preserve compatible land uses and natural habitats near its properties and encourages the Airport District to explore REPI to offset or absorb special status species habitat loss. For more information on partnerships, please refer to [www.repi.mil](http://www.repi.mil).

9  
con't

NSAM values the positive relationship between NSAM and the Monterey Peninsula Airport District and looks forward to continuing to work together toward a compatible future. If you have questions or require additional information, please contact my Community Planning Liaison Officer, Ms. Marlana Brown, at [marlana.brown@navy.mil](mailto:marlana.brown@navy.mil).

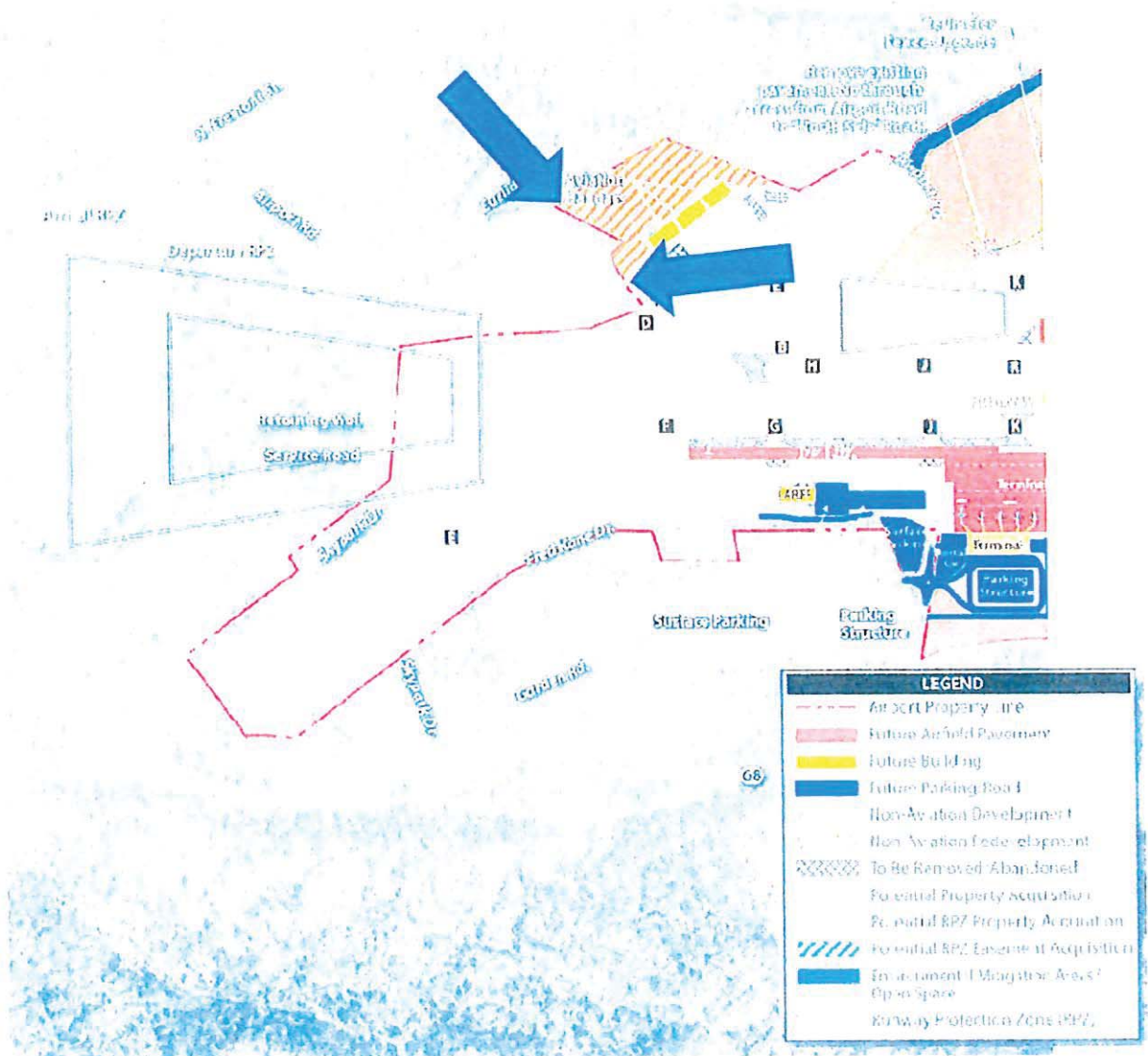
10

Sincerely,



R. A. WILEY

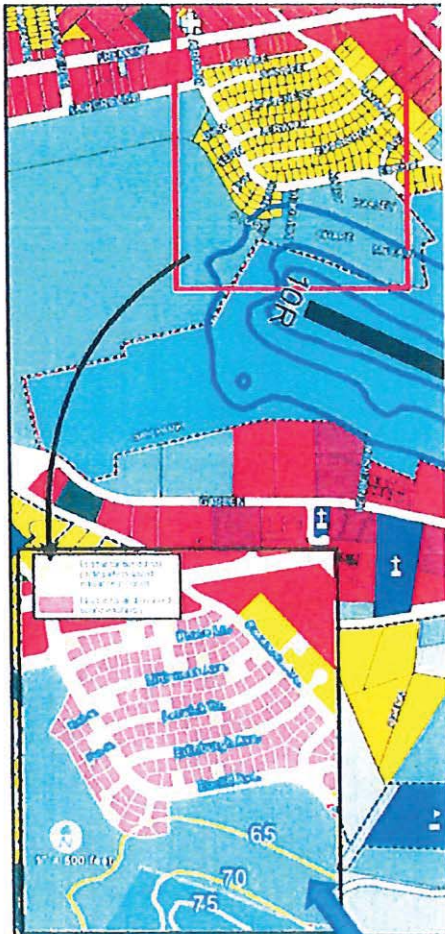
Enclosure 1:  
Development Notification Request Area





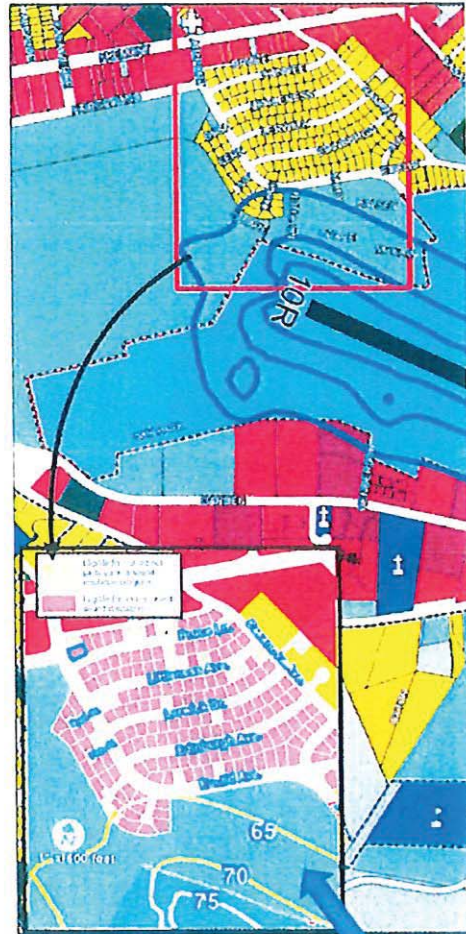
Enclosure 2:  
Noise Contours 2015 and 2035

2015 Noise Contours



Navy Property

2035 Noise Contours



Navy Property



## **COMMENT A3 - United States (U.S.) Department Of The Navy - Naval Support Activity Monterey (NASM)**

### Responses

A3-1: The Airport acknowledges and appreciates the comment. It will be included as part of the Final EIR, which will be considered by the decision-makers. However, the comment provides introductory information that does not raise any issue or make any substantive comment with regard to the adequacy of the Draft EIR. For that reason, the Airport provides no further response to this comment.

A3-2: The Airport is in agreement with this comment and will notify the Department of the Navy whenever specific projects located in the northwestern part of the Airport are under consideration.

A3-3: The Airport will take these requests into consideration when specific development proposals for the northwestern part of the Airport are under review.

A3-4: It is the Airport's understanding that the property referenced in the comment above includes the Fleet Numerical Meteorology and Oceanography Center, Naval Research Laboratory, and National Weather Service. According to the website for the Fleet Numerical Meteorology and Oceanography Center, the mission is to provide the highest quality, most relevant and timely worldwide Meteorology and Oceanography support to U.S. and coalition forces. According to the website for the Naval Research Laboratory, the Laboratory is collocated with the Fleet Numerical Meteorology and Oceanography Center (FNMOC) to support development and upgrades of numerical atmospheric forecast systems and related user products. According to the National Weather Service website, the mission is to provide weather, water, and climate data, forecasts and warnings for the protection of life and property and enhancement of the national economy. While there may be some educational component associated with these organizations, their primary function does not appear to be a school but rather laboratory/research. Based on this information, this area was categorized as "public" land uses.

[https://www.public.navy.mil/fltfor/cnmoc/Pages/fnmoc\\_home.aspx](https://www.public.navy.mil/fltfor/cnmoc/Pages/fnmoc_home.aspx)

<https://www.nrl.navy.mil/field-sites/monterey/>

<https://www.weather.gov/about/>

Further, as explained in Draft EIR Section 4.12.1.5, any increase from 2015 existing conditions in the 65 Community Noise Equivalent Level (CNEL) or greater noise contour in 2035 would occur even if the Proposed Project or Alternative 1 is not implemented, as indicated in Tables 4.12F and 4.12G when comparing the conditions in 2035 with the Proposed Project and Alternative 1 to the conditions in 2035 with No Project alternative.

In addition, as explained in Draft EIR Section 4.12.1.5 and Exhibits 4.12.C and 4.12.D, airport operations under the Proposed Project, Alternative 1, and No Project in 2025 would not cause – near the area of the NSAM facility – a 1.5 dB or more increase resulting in noise-sensitive areas being exposed to 65 CNEL or greater as compared to the existing (2015 baseline) conditions, or a 3.0 dB or more increase resulting in noise-sensitive areas being exposed to 60 CNEL to less than 65 CNEL, as compared to the existing (2015 baseline) condition. Accordingly, potential noise impacts would be a Less than Significant.

A3-5: A majority of the direct overflights of the Fleet Numerical Meteorology and Oceanography Center, Naval Research Laboratory, and National Weather Service facilities are from Runway 10L-28R. Parallel Runway 10R-28L extends abeam of these facilities and only aircraft making early right turns departing Runway 28L would result in direct overflights. Due to noise-sensitive land uses in the City of Monterey and Del Rey Oaks, early right turns are discouraged.

Runway 10L-28R is only 3,513 feet long and is primarily used by smaller single engine piston aircraft. Runway 10L-28R is used approximately five percent of the time for arrivals and departures and 80 percent for local pilot training operations (touch-and-go operations). According to the Federal Aviation Administration-approved forecasts, local training operations are going to decrease by over 27 percent over the next 20 years at Monterey Regional Airport.

A3-6: Direct overflights are not anticipated to increase over the Fleet Numerical Meteorology and Oceanography Center, Naval Research Laboratory, and National Weather Service facilities due to the forecasted decline in local operations. Please see Responses A3-4 and A3-5.

A3-7: The Airport is not in agreement with the statements in this comment regarding significant and unavoidable traffic impacts to the Casanova Oak Knoll area. Under Alternative 1, “the proposed “north side” road would be constructed during the first phase of implementation of the project components relating to safety enhancement” (Draft EIR, Section ES9.0, page ES-20). However, even under the short-term Proposed Project, which would not construct the proposed “north side” road until after the relocation of general aviation hangars to the north side, significant traffic impacts would not occur within the Casanova Oak Knoll Association (CONA) neighborhood. Levels of service (LOS) on the roadways would remain at LOS A or B (Draft EIR, Table 4.16E, page 4.16-36), and no noticeable change in the character of the residential streets would occur (Draft EIR, Table 4.16R, page 4.16-60).

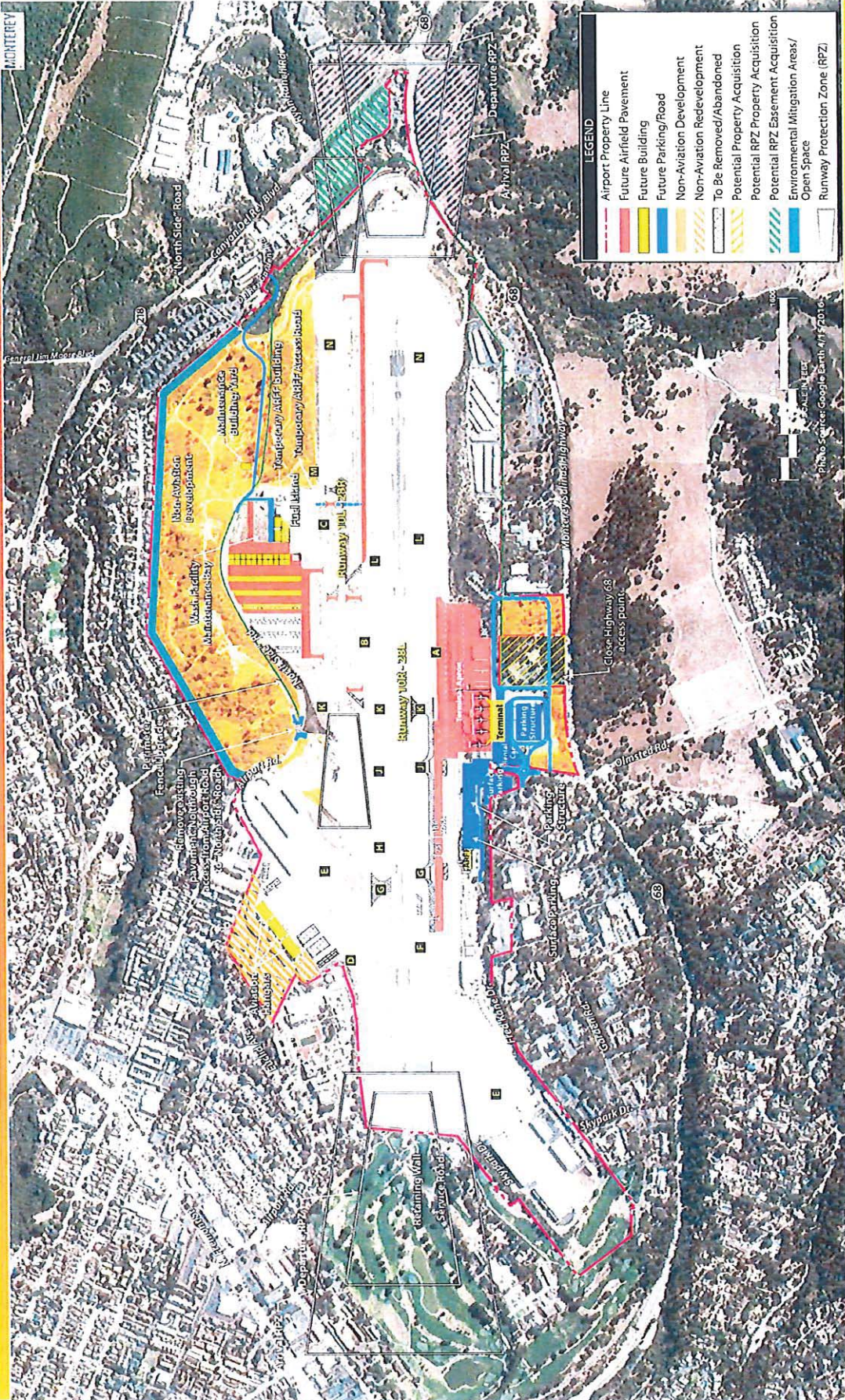
A3-8: The Airport does not consider the referenced project to have been fully vetted and may not be feasible as proposed. The Navy was asked to be a part of this vetting process; however, it is not yet a “reasonably foreseeable or probable” project. The referenced proposal was a preliminary concept plan, and no formal application for a development project that contains detailed project plans has been submitted.

In addition, potential redevelopment of the northwest portion of the Airport is also not specified at this time and is addressed only at the most general “programmatic” level within the Draft EIR. See also Topical Response #1.

A3-9: The Airport acknowledges and appreciates the comment. It will be included as part of the Final EIR, which will be considered by the decision-makers. However, the comment does not raise any issue or make any substantive comment with regard to the adequacy of the Draft EIR. For that reason, the Airport provides no further response to this comment.

A3-10: The Airport acknowledges and appreciates the comment. It will be included as part of the Final EIR, which will be considered by the decision-makers. However, the comment provides a conclusion with regard to the comments provided above and does not raise any issue or make any substantive comment with regard to the adequacy of the Draft EIR. For that reason, the Airport provides no further response to this comment.





**LEGEND**

- Airport Property Line
- Future Airfield Pavement
- Future Building
- Future Parking/Road
- Non-Aviation Development
- Non-Aviation Redevelopment
- To Be Removed/Abandoned
- Potential Property Acquisition
- Potential RPZ Property Acquisition
- Potential RPZ Easement Acquisition
- Environmental Mitigation Areas/Open Space
- Runway Protection Zone (RPZ)

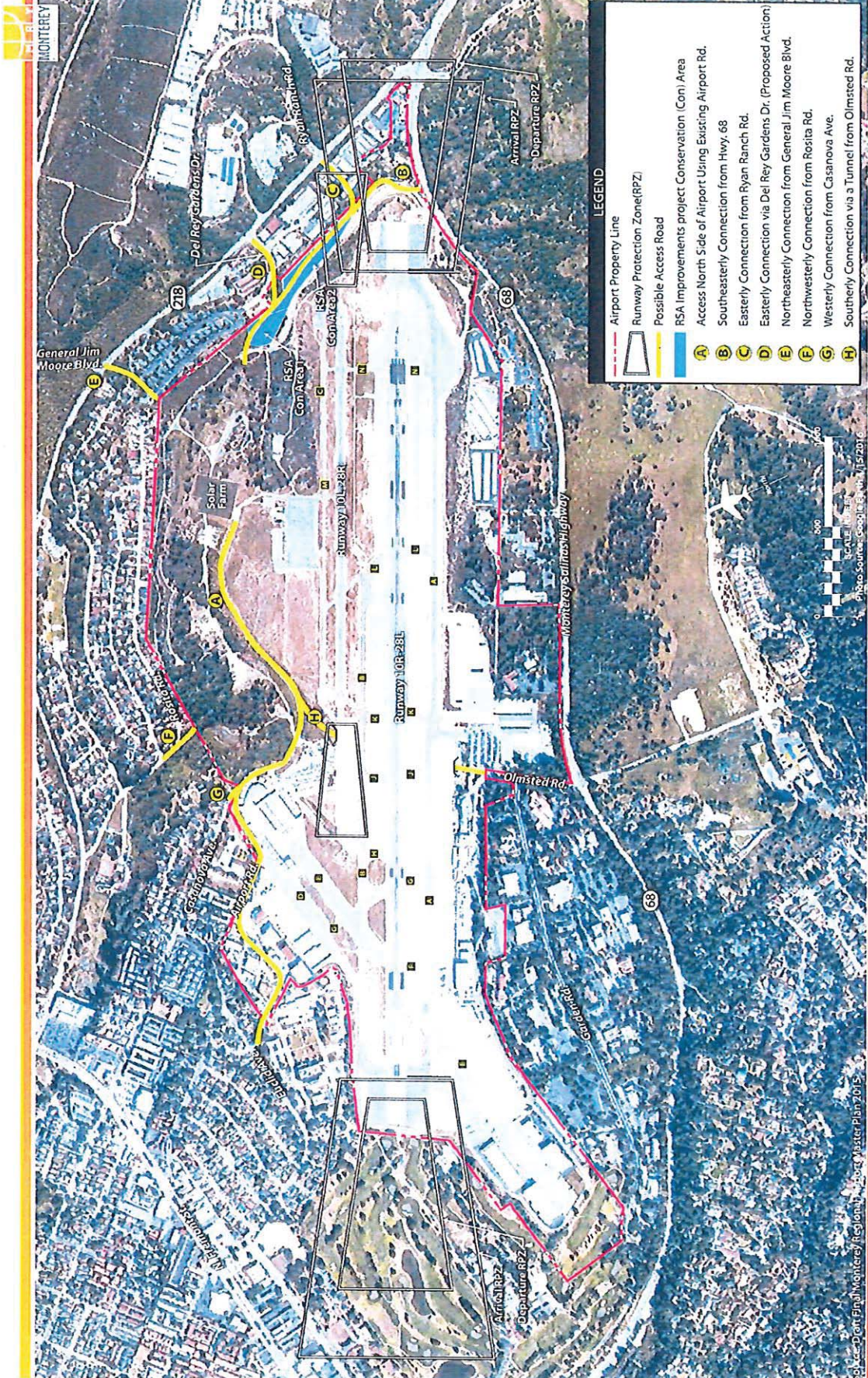
Enclosure (2)





Enclosure (3)





DRAFT Environmental Assessment  
 Exhibit 2C  
 'NORTH SIDE' ROAD ALTERNATIVES  
 2-13  
 Source: Port of Monterey Regional Airport Master Plan 2015



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**APR 30 2020**

**MONTEREY PENINSULA  
AIRPORT DISTRICT**

**From:** [REDACTED]  
**Sent:** Thursday, April 30, 2020 12:24 PM  
**To:** Planning  
**Subject:** North side Airport Road Issues

Dear planning commission,  
I'm writing you regarding the Monterey Airport's environmental assessment (EA) to acknowledge and support the plan to have traffic from the airport use the existing roads (Olmstead and Airport roads), rather than propose a new north side road to connect to highway 218.  
My family and I have lived in Del Rey Oaks (DRO) for almost twenty years, and we feel that our quality of life would be adversely affected by any new road connecting the north side of the airport to highway 218, which is already congested and would become less safe for the residents of DRO. This is why the DRO General Plan is against any new airport access road connecting to highway 218.  
If possible, I would suggest that the new airport rescue firefighting facility be placed on the south side of the airport, where a road already exists.  
Thank you for your consideration of these requests.  
Respectfully,  
Juan Manuel Ezcurra

#98

Sent from my iPhone

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**From:** [REDACTED]  
**Sent:** Thursday, April 30, 2020 1:47 PM  
**To:** Planning  
**Subject:** Proposed airport road

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**APR 30 2020**  
MONTEREY PENINSULA  
AIRPORT DISTRICT

> Dear planning commission,

> I'm writing you regarding the Monterey Airport's environmental assessment (EA) to acknowledge and support the plan to have traffic from the airport use the existing roads (Olmstead and Airport roads), rather than propose a new north side road to connect to highway 218.

> My family and I have lived in Del Rey Oaks for almost twenty years, and we feel that our quality of life would be adversely affected by any new road connecting the north side of the airport to highway 218, which is already congested and would become less safe for the residents of DRO.

> This is why the DRO General Plan is against any new airport access road connecting to highway 218.

> If possible, I would suggest that the new airport rescue firefighting facility be placed on the south side of the airport, where a road already exists.

> Thank you for your consideration of these requests.

> Sincerely,  
> Roxane Buck

#99

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**From:** [REDACTED]  
**Sent:** Thursday, April 30, 2020 2:39 PM  
**To:** Planning  
**Subject:** Concerns

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**MONTEREY PENINSULA**  
**AIRPORT DISTRICT**

Dear Sirs:

I have been a resident of Del Rey Oaks for 40 years. I have the following concerns regarding the Airport's Environmental Assessment;  
I am in support of the decision NOT to put a Northside road through Del Rey Oaks because  
It is against our General Plan  
It has been suggested that the ARFF will be located on the north side of the airport. I would favor a south side location because there would be quicker response times for Monterey and would prevent emergency vehicles from going through the neighborhood of CONA  
I hope you will take into consideration the input of Del Rey Oaks citizens in your decisions.

#100

Sincerely,  
Carol Kaplan

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**MAY 01 2020**

**MONTEREY PENINSULA  
AIRPORT DISTRICT**

**From:** [REDACTED]  
**Sent:** Thursday, April 30, 2020 10:17 PM  
**To:** Planning  
**Subject:** Comments on Environmental Assessment

As a resident of the Monterey Peninsula (specifically Del Rey Oaks) I am concerned that the planned future development at Monterey Airport will have long lasting negative impacts on the community.

1-I am concerned that habitat for endangered species will be destroyed. While I appreciate the planned efforts to mitigate damage, I am aware that uncontrollable forces, like drought, can negate those efforts. As open space is reduced world-wide we are experiencing an increase in plant and animal extinctions. I don't think that the benefits of this expansion outweigh the loss to the environment.

#101

2-I oppose the Northside road through Del Rey Oaks. This goes against the city's General Plan and will also impact habitat and increase local traffic.

The airport is in a small area and near residential communities. The quiet hours are not honored as there are daily flights scheduled outside of quiet hours. Flight schools are allowed to operate over residential areas and serve as a tourist attraction. The noise from the airport increases every year. The airport has already out-grown it's space. These safety enhancements seem to be designed to increase future airport use and profit which will not benefit the local community as a whole. Increased air pollution and noise pollution are not a benefit to anyone.

#102

Thank you,  
Cindy Hickey

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**From:** [REDACTED]  
**Sent:** Thursday, April 30, 2020 5:20 PM  
**To:** Planning  
**Subject:** North Side Airport Road Issues

**RECEIVED**

**MAY 01 2020**

**MONTEREY PENINSULA  
AIRPORT DISTRICT**

Dear planning commission,

I'm writing you regarding the Monterey Airport's environmental assessment (EA) to acknowledge and support the plan to have traffic from the airport use the existing roads (Olmstead and Airport roads), rather than propose a new north side road to connect to highway 218.

My family and I have lived in Del Rey Oaks (DRO) for almost twenty years, and we feel that our quality of life would be adversely affected by any new road connecting the north side of the airport to highway 218, which is already congested and would become less safe for the residents of DRO. This is why the DRO General Plan is against any new airport access road connecting to highway 218.

If possible, I would suggest that the new airport rescue firefighting facility be placed on the south side of the airport, where a road already exists. Thank you for your consideration of these requests.

Sincerely,

Ella Ezcurra

#103

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**From:** [REDACTED]  
**Sent:** Thursday, April 30, 2020 5:48 PM  
**To:** Planning  
**Subject:** Airport Road

**RECEIVED**  
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**MONTEREY PENINSULA**  
**AIRPORT DISTRICT**

Dear planning commission,  
I'm writing you regarding the Monterey Airport's environmental assessment (EA) to acknowledge and support the plan to have traffic from the airport use the existing roads (Olmstead and Airport roads), rather than propose a new north side road to connect to highway 218. My family and I have lived in Del Rey Oaks (DRO) for almost twenty years, and we feel that our quality of life would be adversely affected by any new road connecting the north side of the airport to highway 218, which is already congested and would become less safe for the residents of DRO. This is why the DRO General Plan is against any new airport access road connecting to highway 218. If possible, I would suggest that the new airport rescue firefighting facility be placed on the south side of the airport, where a road already exists. Thank you for your consideration of these requests.

#104

Thank you,  
Margo Ezcurra

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**From:** [REDACTED]  
**Sent:** Friday, May 1, 2020 8:14 AM  
**To:** Planning  
**Subject:** Comments on the airport road

**RECEIVED**

**MAY 01 2020**

**MONTEREY PENINSULA  
AIRPORT DISTRICT**

This email is to submit my comments on the airport's planning. I want to commend and acknowledge that the EA has decided to halt the plans to put a road through the northside of the property and through Del Rey Oaks. This is the right decision, and I support it. Not only is it against Del Rey Oak's general plan, but it could potentially cause additional noise and air pollution due to increased traffic that will negatively impact our ecosystems and quality of life in Del Rey Oaks. Thank you in advance for entering my comment into the public record.

#105

Alexis Naficy  
[REDACTED]

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MAY 01 2020

MONTEREY PENINSULA  
AIRPORT DISTRICT

**From:** [REDACTED]  
**Sent:** Friday, May 1, 2020 8:12 AM  
**To:** Planning  
**Subject:** Comment regarding Monterey Regional Airport's Draft Environmental Assessment

Re: The Monterey Regional Airport's (MRY) Draft Environmental Assessment (5/1/2020)

To Whom It May Concern:

We studied parts of the Draft Environmental Assessment, and we are in favor of the elimination of the North Side Access road through Del Rey Oaks to Highway 218; and the re-route of the road is a positive step for Del Rey Oaks and MRY. We also favor the eventual permanent location of the ARFF to the south-side of the airport, since this enables a faster response to emergencies.

#106

The Draft EA is an extensive, comprehensive and thorough document that highlights the need for increased airplane safety at Monterey Regional Airport. That need must be balanced with protection of the Monterey Peninsula environment, and MRY addresses environmental considerations in the Draft EA.

However, we believe that any development at MRY has potential negative environmental affects especially within communities proximate to the airport. Del Rey Oaks is one of those communities, and as DRO residents we constantly hear airplane noise, experience particulate pollution and at times even smell jet exhaust fumes. Especially bothersome are: 1) the noise generated by engines or APUs early on most mornings around 5:30 AM; 2) the circle touch-n-go maneuvers of fixed wing aircraft; and 3) the low flying helicopters that buzz the tree tops during landing approach.

#107

It is credible that these pollution factors will increase as the airport develops. Of equal concern is the plan to move general aviation operations onto the airport north-side and thus closer to the residents of Del Rey Oaks. We fear that because of this move we will hear more noise, experience more airborne pollutants and witness greater environmental disturbance. Also, the planned movement of fuel storage closer to the residents of DRO raises a red flag, and we are concerned about potential spills. These spills if not properly contained may end up in the Canyon Del Rey Creek alongside The Church of the Oaks and its day care center.

Today, we are experiencing a major health event in America and the world. The normal day-to-day activities of the entire planet are on hold, and we see how unprepared we are even though warnings of probable global pandemics existed. Consequently, airport planners would do well to consider that exposure to even small amounts of fine particulate matter (pollution) is related to a 15% rise in covid-19 deaths according to Harvard scientists.

Sincerely,

Wayne Marien  
Elizabeth Stacey  
Del Rey Oaks, California

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**From:** noreply@getstreamline.com  
**Sent:** Friday, May 1, 2020 8:51 AM  
**To:** Amanda Auker  
**Subject:** Form submission received: Contact Us

**RECEIVED**

MAY 01 2020

MONTEREY PENINSULA  
AIRPORT DISTRICT

## Form submission received: Contact Us

<b>Your name:</b>	Cristofer and Shelley Cabanillas
<b>Your email:</b>	[REDACTED]
<b>Subject:</b>	Comments on Airport's Environmental Assessment
<b>Message:</b>	<p>Hello. As residents in the city of Del Rey Oaks, we would like to submit a comment regarding the Environmental Assessment's decision to NOT put a northside access road through Del Rey Oaks. We are pleased by this decision and believe it to be a very positive plan. A road through Del Rey Oaks is opposed to our city's general plan, Policy C-17, which is meant to prevent adverse impacts of through traffic on Highway 218 as well as on roads and streets. Also, as a resident living close to the airport, we have great concerns over the potential environmental consequences stated in the Environmental Assessment to include: air quality, pollution, hazardous materials, solid waste, noise, compatible land use, and water resources. Thank you for your decision and continued support to NOT have a road through our home community, which would have substantial negative impact on our quality of life. Sincerely, Cristofer and Shelley Cabanillas</p>

#108

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**MAY 01 2020**

**MONTEREY PENINSULA  
AIRPORT DISTRICT**

**From:** [REDACTED]  
**Sent:** Friday, May 1, 2020 9:15 AM  
**To:** Planning  
**Subject:** Airport Road

I'm glad for the decision not to build the Northside access road through Del Rey Oaks. Such a road would change the character of Del Rey Oaks and violates the city's General Plan. And the citizens of Del Rey Oaks are strongly against such a road. There are issues of traffic, air quality, noise, etc, and there is no benefit to the city. I just want to make sure the road issue is done with.

#109

Arlen Grossman  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, May 1, 2020 9:41 AM  
**To:** Planning  
**Subject:** Comments for the Draft Environmental Assessment  
**Attachments:** EA CommentsKShirley.pdf

Good morning,

Please see the attached letter which are my comments I would like submitted for the Draft Environmental Assessment report.

Thank you for this opportunity.

Best regards,  
Kim Shirley

---

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May 1, 2020

Monterey Peninsula Airport District  
Attn: Chris Morello, Deputy Director of Strategy and Development  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940

**RECEIVED**

**MAY 01 2020**

**MONTEREY PENINSULA  
AIRPORT DISTRICT**

Subject: Comments regarding the Draft Environmental Assessment for the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations at Monterey Regional Airport

Dear Ms. Morello,

I appreciate the opportunity to comment on the Airport's Draft Environmental Assessment for the Airfield Safety Enhancement Project for Taxiway "A". As a resident of Del Rey Oaks, I'd like to share my appreciation for the Airport's decision to direct traffic, coming from the new northside development, through the currently existing, Airport Road, as opposed to building a new northside access road through Del Rey Oaks. I support this decision for the following reasons:

1. The General Plan for Del Rey Oaks, for decades, has stated the following: Policy C-17: "The City will not support the potential north side access from HWY 218 and Del Rey Gardens drive or any airport access road through the City of DRO."
2. Without this northside access road, the Airport also supports Goal #3 of the Circulation portion of the Del Rey Oaks General Plan which is meant to "prevent adverse impacts of through traffic on HWY 218 as well as on roads and streets."
3. In addition, since HWY 218 is owned by Cal Trans, the Airport nor the City of Del Rey Oaks would have the ability to mitigate additional traffic in this area.
4. A very large percentage of our residents are not supportive of a northside access road through Del Rey Oaks. Our City is split down the middle by HWY 218 and it is our main thoroughfare for leaving or returning to Del Rey Oaks. For the portion of City that lives on the southside of Del Rey Oaks, HWY 218 is the ONLY road available to exit or enter the City. If there was increased traffic, it would greatly affect the lives of all residents.
5. Airport Rd. already exists and therefore should be used for this purpose.
6. Biological surveys showed that the federally threatened Monterey Spineflower had populations in the location of the northside access road. Eliminating this road greatly reduces the fragmentation of its habit and increases the benefits to this plant's survival.

#110

Overall, there are many reasons to use Airport Rd. as the northside access point, and therefore I'm very supportive of this decision.

I'd like to also address the placement of the Airport Rescue Firefighting Facility (ARFF). According to the EA, the final placement will be on the northside. If this is indeed the case, I would like to see that the emergency vehicles travel across the tarmac and exit out through Olmstead Rd. to HWY 68, thereby avoiding driving on Airport Rd. and through the Casanova Oak Knolls residential neighborhood. This pathway for the emergency vehicles was mentioned by Chairperson Mary Ann Leffel while she was presenting at our City Council meeting (March 24, 2020) and so I'd like to emphasize that route, as it seems to be the safest (not needing to speed through the CONA

#111

neighborhood) and the quickest route for the first responders when responding to emergencies located off of HWY 68.

Along those same lines, Chair Leffel also mentioned at the March 24<sup>th</sup> City Council meeting that the Airport may still be considering moving the ARFF to the southside of the Airport. Ultimately, this would be most beneficial location, since it would provide a shorter distance to HWY 68 thus increasing response times, while also keeping the CONA neighborhood safe from speeding emergency vehicles.

#111  
cont.

Lastly, although the EA does not address the potential soil and groundwater contamination of PFAS, according to the most recent report, there are three areas on the Airport grounds which were found to have exceeded limits for this group of chemicals. According to the report by Wood Environment and Infrastructure, Inc., submitted April 20, 2020, Area 1 (Tug/Aircraft Brakefire) was found to have high levels of PFOA in the groundwater sample. Area 3 (ARFF Station) was found to have high levels of both PFOA and PFOS in the groundwater as well as Area 6 (Former FFTA/Burn Pit) which was found to have high levels of various PFAS in the soil as well as high levels of PFOA in the groundwater samples. Given that these three locations are essentially uphill from both Monterey (Areas 1 and 3) and Del Rey Oaks (Area 6), I am concerned with both how water and soil runoff, as well as soil disturbance through the construction activities, will affect our cities. I'd like to know how the Airport plans to mitigate these exceedingly high levels of chemicals and what their clean-up plan will be. A timeline of when the clean-up will happen in relation to the construction of the expansion project would also be good to know.

#112

Again, I am very pleased there will not be a northside access road through Del Rey Oaks for the many reasons stated above. I also strongly would like consideration given to putting the ARFF on the southside of the Airport, and I'm very interested in clean-up plans for the PFAS in relation to your construction project.

Thank you for this opportunity to comment on this Environmental Assessment.

Sincerely,



Kimberly Shirley  
Resident of Del Rey Oaks

---

**From:** [REDACTED]  
**Sent:** Friday, May 1, 2020 10:30 AM  
**To:** sglennon@montereyairport.com; Planning  
**Cc:** [REDACTED]  
**Subject:** Attention Chris Morello - Public Comment on MRY EA  
**Attachments:** Airport Letter EA 5.1.20.docx

Mr. Morello,  
Please find my attached comment letter for consideration.  
Thank you,  
Ken Rutherford  
Resident of Del Rey Oaks

Sent from [Mail](#) for Windows 10

---

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MAY 01 2020

MONTEREY PENINSULA  
AIRPORT DISTRICT

5/1/2020

To Whom It May Concern,

I am writing to comment on various items in the Draft Environmental Assessment Report and the Monterey Airport's multi-phased safety enhancement project plans.

Given the current state of affairs with the air transportation industry that has been caused by the global health crisis I would strongly encourage the No Action Alternative for this project be adopted until the estimates, projections and data contained and used in this report can be properly considered in light of the recent and drastic changes the industry has incurred. The recent pandemic is likely to permanently change the industry so now is not the time to make such a major financial commitment to move forward with changes that may no longer be needed or that may need substantial alteration to meet future needs and demand.

The No Action alternative described in 2.3.1 of the report should be adopted at this time. The FAA waiver currently allows the current configuration of Taxiway "A" by simply requiring that whenever a Boeing 737 or larger is operating on/to the runway another similarly large aircraft cannot operate on Taxiway "A" between Taxiways "F" and "K." The recent health crisis has drastically changed the air transportation industry with respect to current needs and service requirements and that is likely to remain the case into the future. Such large aircraft utilizing MRY may be reduced or even eliminated going forward and the current traffic control procedures being utilized now are more than sufficient to guarantee continued safety at MRY without jeopardizing safety. It is unclear if or when the industry will return to the same conditions and manner of service that existed prior to this crisis and there is a very strong likelihood that air travel will forever be changed and that the demand for more large aircraft utilizing MRY may never materialize. Therefore, given the uncertainties and the changes this pandemic has already caused to the projections and data supporting this draft EA it seems that the responsible and prudent action to take at this time is to adopt the No Action alternative, especially considering the extreme costs and the disruptions to the already stressed communities surrounding the airport and the environmental impacts, regardless of how extreme or minimal those may be to move this project forward.

#113

Regarding 2.5.2 Alternatives to Access the North General Aviation Area (Phase 1) , I am in complete agreement that Alternative D, an easterly connection via Del Rey Gardens Drive should be deemed not feasible and should be excluded from further consideration.

As set forth on page 2-15 of this report the General Plan for the City of Del Rey Oaks Circulation Policy C17 Airport Plan states: "The City will not support the potential north side access from Highway 218 and Del Rey Gardens Drive or any airport access road through the City of Del Rey Oak s." It is clear from this language and from the actions of and comments by the Del Rey Oaks residents at hearings and meetings about this project that this proposed alternative is in stark contrast with the needs and wishes of our community and any attempt to change our General Plan regarding this issues would be met with immediate resistance. Therefore, I am in agreement with the removal of this alternative from further consideration.

#114

The No Action alternative for access to the North General Aviation Area would continue to use Airport road, which has apparently been the case since the general aviation area has existed and no

#115

additional impact would occur by continuing to utilize Airport Road for such access. In fact Mry Airport Board Chair Leffel noted at our recent City Council meeting that the current plans of eliminating and reducing businesses that do business with or lease from the airport on the south side of the airport will actually be reducing the traffic on Airport Road. Therefore, given the lack of disruption to the surrounding communities and to the environment that utilizing the existing road would allow all other alternatives should remain out of consideration.

#115  
cont.

Regarding 2.5.3 Alternatives for a New Aircraft Rescue and Firefighting Facility (ARFF) (Phase 2) , I would strongly encourage finding an alternative that would allow the locating of this facility on the south side now rather than during a later phase of this project. Building and locating an ARFF for a 6 year temporary period is wasteful and requires the emergency vehicles to transit over taxiways or runways to exit the airport facilities as needed. Relocating the facility to the south side now rather than later would provide better access to Highway 68 and allow response times to be better for other emergencies. The south side location is the preferred location, as expressed to us by Chair Leffel.

Thank you for your consideration of these comments,

Ken Rutherford,

Resident of Del Rey Oaks

MAY 01 2020

MONTEREY PENINSULA  
AIRPORT DISTRICT

**From:** Airport Study Comment Form <noreply@airportstudy.com>  
**Sent:** Friday, May 1, 2020 11:00 AM  
**To:** jkrauss coffmanassociates; jmharris coffmanassociates; Planning  
**Subject:** MontereyEIR.airportstudy.com - comments

**Name**

Alice Angell Green

**Email**

[Redacted]

**Address**

[Redacted]

[Map It](#)

**Subject**

Proposed Expansion

**Your Comments**

The proposed expansion of the airport in this location is clearly ill-conceived, as are the proposed options of either building a road through Del Rey Oaks or changing the type of traffic through the existing road in Monterey.

Putting in a substantial number of new hangers for noisy private planes next to two lovely local neighborhoods is a terrible idea. More noise, more traffic--neither neighborhood will benefit in any way from these changes. Putting in a northside road or going through the neighborhood in Monterey with emergency vehicles as proposed makes far less sense than connecting directly with Highway 68.

For this area to have a bigger regional airport, it needs to be moved to Marina--there is room and the regional access would be far, far superior!

Thank you for your time.

Alice Angell Green

#116

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**From:** [REDACTED]  
**Sent:** Friday, May 1, 2020 11:09 AM  
**To:** Planning  
**Cc:** doug mackenzie  
**Subject:** Comment on Draft EA

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**MAY 01 2020**  
**MONTEREY PENINSULA**  
**AIRPORT DISTRICT**

May 1, 2020

To Whom It May Concern:

Happy May Day!

I reviewed the draft EA and did not find reference to PFAS at MRY or how the existence of PFAS at various locations will impact the proposed airport expansion.

The Investigation Report prepared by Wood Environment & Infrastructure Solutions, Inc. reveals high levels of PFAS at Investigation Areas 3 and 6, both areas proximate the proposed expansion. #117

[https://documents.geotracker.waterboards.ca.gov/esi/uploads/geo\\_report/5538216650/T10000012767.PDF](https://documents.geotracker.waterboards.ca.gov/esi/uploads/geo_report/5538216650/T10000012767.PDF)

It is my opinion that the EA should address this issue.

Thank you,

Douglas Mackenzie  
[REDACTED]

---

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**From:** [REDACTED]  
**Sent:** Friday, May 1, 2020 11:50 AM  
**To:** sglennon@montereyairport.com; Planning  
**Cc:** [REDACTED]  
**Subject:** Draft EA Comment

Attn: Chris Morello, Deputy Director of Strategy and Development  
Monterey Regional Airport  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940

Dear Chris Morello:

RE: Draft Environmental Assessment for the Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation & Associated Building Relocations at Monterey Regional Airport

Thank you for the opportunity to provide comments on the Draft EA. As an airport neighbor on Rosita Rd, Del Rey Oaks, I have many concerns with the proposed project as listed below:

1. Construction noise – why work at night? Even airplanes have quite times from 11 PM – 6 AM. Please follow the same so residents can get rest some time during the 24 hours. #118
2. Habitat loss and mitigation measures are inadequate. Paving the north side service road will destroy endangered flora and fauna. There is no way to mitigate this. If construction does move forward, be sure to replace endangered/listed species and avoid bird nesting seasons. #119
3. ARFF fire training stormwater runoff – PFAs will run off into the creek. Secondary containment is required and wastewater should not be allowed to flow across the property and into the watershed. #120
4. Wash areas: ensure washwater flows to an interceptor and then to the sanitary sewer rather than the stormdrain.
5. Hangars:
  - a. Why do you need so many new hangars? Using FAA grant funds for non-aviation facilities to increase airport district revenues seems incompatible with the intent of those public funds.
  - b. Moving them to the north side will create additional traffic through Casa Nova Oak Noll residential neighborhood.
  - c. So many oak trees will be removed – this green belt was intended to provide a sound barrier.
6. Moving the ARFF to the North side will delay emergency response time by driving around to Airport Rd.
  - a. Having emergency vehicles racing through the Casa Nova Oak Noll residential neighborhood with sirens and flashing lights is unacceptable and defies the Monterey General Plan.
  - b. If you must have the ARFF on the north side, consider placing a tunnel under the runway to exit to Hwy 68 for faster response times for Fisherman’s Flats, Deer Flats, and Ryan Ranch.
  - c. Keeping ARFF on the south side will negate the need to build/enhance a service access road around the west and northwest perimeter. This would reduce environmental impacts as well.
  - d. Keeping ARFF on the south side will reduce watershed runoff and loss of endangered/listed species.
7. The Draft EA is much different from the approved Final EIR. How can it be valid? Very little or no outreach was conducted to explain the changes to the public. #123
8. The dirt removed from the current hangar location on high ground to be leveled – testing is needed to ensure there will be no contaminants moved close to our neighborhood. #124
9. Please provide PFAs toxics analysis data conducted by Wood Environmental.



The airport district could have done a much better job outreaching to the public about the Draft EA. I can't think of any workshops or online Q/A for the project. We are grateful that Board Chair Mary Ann Leffel joined our City Council Zoom meeting to answer questions – but this was only done because Mayor Kerr asked her. Although we are grateful the Alternative A has been abandoned to prevent a road through Del Rey Oaks, there are still many concerns.

#125

Please consider my comments. I look forward to your reply.

Respectfully,

Karen Harris  
Del Rey Oaks

---

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MONTEREY PENINSULA AIRPORT DISTRICT

From: Airport Study Comment Form <noreply@airportstudy.com>  
Sent: Friday, May 1, 2020 1:26 PM  
To: jkrauss coffmanassociates; Planning  
Subject: MontereyEA.airportstudy.com - comments

Name

Susan Ragsdale-Cronin

Email

[Redacted]

Organization

Sustainable Del Rey Oaks

Address

[Redacted]

[Map It](#)

Subject

Airport Construction

Your Comments

Dear Airport Board-  
Please consider that every person on the planet, including people deep in the Amazon and other very wild places, has jet fuel in their blood. With the advent of cancer becoming a public health crisis and other chronic illness, such as, diabetes, asthma, etc.... as a board member you are in a position to mitigate this situation to the benefit of all concerned. Air travel is wonderful to visit aging relatives, etc... but these trips should be special, there is no way to mitigate the impacts of jet fuel that I know of... if I were in your position, I would do everything in my power to balance flying and health concerns.  
I know that you want to go back to the Earth knowing you did everything in your power to keep all life on earth safe.  
Thank-you so much for putting the resident's health concerns in the forefront of all discussions.  
Susan Ragsdlae-Cronin

#126

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**From:** Michael Weaver <michaelrweaver@mac.com>  
**Sent:** Friday, May 1, 2020 11:39 AM  
**To:** Planning  
**Cc:** Jim.Lomen@faa.gov; Maverick.Douglas@faa.gov  
**Subject:** Comments re: Draft EA MRA Airfield Safety Enhancement, Taxiways relocation, building relocations  
**Attachments:** EAforMRA43020Hwy68Coa..pdf; ATT00001.txt

Dear Ms. Chris Morello,

Please find attached comments from the Highway 68 Coalition.  
Please confirm receipt.  
If for some reason the attachment will not open, please call and I can fax it to you.

Thank you,

Mike Weaver, Chair  
The Highway 68 Coalition  
831-484-2243

---

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**MONTEREY PENINSULA  
AIRPORT DISTRICT**

The Highway 68 Coalition

The Highway 68 Coalition is a volunteer non-profit 501(c)4 organization of households adjacent to, or mostly near State Scenic Highway 68. It was formed because of mutual interests, and concerns with traffic congestion, noise, water quantity and quality, adequate fire and sheriff protection, the preservation of the Scenic Highway status, and of maintaining the rural character of the Highway 68 area between the Cities of Salinas and Monterey.

To: Monterey Regional Airport, 200 Fred Kane Drive, Suite 200,  
Monterey, CA 93940

Attn: Chris Morello, Deputy Director of Strategy and Development,  
via email: [planning@montereyairport.com](mailto:planning@montereyairport.com)  
and,

To: FAA San Francisco Airports District Office, 1000 Marina Boulevard,  
Suite 220, Brisbane, CA 94005-1835

Attn: Jim Lomen and Douglas Maverick  
via email: [jim.Lomen@faa.gov](mailto:jim.Lomen@faa.gov) & [maverick.douglas@faa.gov](mailto:maverick.douglas@faa.gov)

Re: Comments to; Public Notice on a Draft Environmental Assessment for the  
Proposed Airfield Safety Enhancement Project for Taxiway "A" Relocation &  
Associated Building Relocations at Monterey Regional Airport

April 30, 2020

Dear Monterey Regional Airport and Federal Aviation Administration,

The Highway 68 Coalition is responding to the Public Notice mailed to us on  
April 5, 2020 providing Notice of Final Extension of the Public Comment to a  
Draft Environmental Assessment for the Proposed Airfield Safety Enhancement  
Project for Taxiway "A" Relocation & Associated Building Relocations at  
Monterey Regional Airport

We've had the opportunity to review the MRA's EA document online and have  
the following comments and findings;

- 1) The scope of the proposed cumulative projects in the EA exceed the  
description given in the distributed Public Notice. Why?
- 2) EA page 3-45 gives very little information or analysis about the history of the  
Scenic Highway designation, the studies that were done for the County

#127

#128



following the designation and how best to both implement and retain the status. There are no visual sketches provided for highway motorist/hiker/ biker impacts. Why?

#128  
cont.

3) Highway 68 was designed for a maximum of 16,000 vehicles per day. It now serves 25,000-30,000 per day depending on the time of year. The Level of Service was declared to be "F" in 1997 by the Transportation Agency for Monterey County (TAMC). Although there is some money for improvements due to a County sales tax measure passed by voters a few years ago, year 2026 might be the earliest for beginning improvements. Traffic Roundabouts are currently being studied as improvement. The point here is plans for expansion by spending Federal Money for more airplanes/customers at this airport when the surrounding infrastructure can't handle it, makes no sense. Why is just the Monterey Airport being studied for expansion?

#129

4) Water use analysis is deficient in that Monterey Regional Airport utilizes California American Water (CalAm) as their supplier. CalAm killed the Carmel River by over-pumping it and there is currently not enough water to go around for existing development, much less any new water using development. Yes, the MRA has some wells but it is unclear as to source water rights and the amounts of safe yield these wells could provide, in addition to the quality of the water. More water for CalAm has been tied up in litigation as have various ideas on how to produce it. How can planned expansion of an airport terminal designed to serve more customers be compatible with known water limitations?

#130

5) The Monterey Regional Airport sits on it's own property, atop a knoll that confines it. It is surrounded by property owned by the City of Monterey, The City of Del Rey Oaks and the County of Monterey. The Airport District Boundaries spread out into surrounding areas. How the District Boundaries were established is a mystery as residential and commercial areas effected by the Airport are not all included within the Boundaries established. For example, the current eastern boundary only extends to Laureles Grade Road. Further, and importantly, the Board of Directors for the MRA are elected in District-wide elections. There are no divisions to allow people in the various areas of the District an opportunity to choose a representative that may offer better representation. Currently, the Board is largely made up of people representing the Hospitality Industry and the Monterey Peninsula and business interests. How can the FAA facilitate representational Airport District Boundaries?

#131

6) The MRA Board petitioned the FAA to change its name from the "Monterey Peninsula Airport" to the "Monterey Regional Airport" by arguing they serve more than just the Peninsula. However, Monterey County has other airports somewhat largely ignored, these are the former Army airport in the nearby City of Marina, an airport in the nearby City of Salinas, and an airport in the southern part of Monterey County in the City of King City. What aren't other



nearby airports included in one Airport District? Does the FAA not oversee these airports too?

- 7) Highway 68 Coalition recommendations regarding Airport Transportation for the next Century; broaden the District Boundaries to better include those that will be served, better utilize existing resources, spend taxpayer dollars on more feasible locations for airport expansion. Include more than one airport in this Monterey Regional Airport District.
- 8) Why not do a real regional Environmental Assessment prior to committing millions of taxpayer dollars? The United States Army's (former) Fort Ord was the second largest military training base in the United States. They built the airport called Fritzsche Army Airfield to serve the transportation of thousands of troops and equipment. It now sits within the boundary of the City of Marina, and its location is served by State Highway 101, and County roads Blanco Road and Reservation Road, all of which have better Traffic Levels of Service than Highway 68. Regarding water, the Marina area is served not by CalAm but by the Marina Coast Water District that does not have the stringent water supply problems that CalAm has. Where is an EA airport comparison analysis?
- 9) The United States Army was not stupid when it built Fritzsche Airfield. It was built on flat land with room for expansion. This under-utilized airport would be perfect for the interstate airline traffic arriving and leaving Monterey County. Compare the flat land the Fritzsche Airport is built upon with the hilltop airport (MRA) created near Monterey in 1936. Again, where is an EA comparison analysis?
- 10) The Monterey Regional Airport would be perfect for retaining their Jet Center, and for smaller jets/planes serving surrounding areas. It would eliminate much of the MRA Board's professed need for the existing two landing strips at MRA, and thus the need to relocate and build not only a much larger Airport Terminal, but also a much larger new Airport parking lot. The Salinas Airport could continue to serve the agricultural and business community. A combined District could share resources. How much Federal taxpayer money could this save?
- 11) A considerable amount of current MRA property has environmental flora and fauna issues, including much of which has already been set aside as mitigation for past development. These environmentally sensitive set aside areas include portions of the "North Side" that the MRA has plans to further build out. These environmental issues are not as pronounced at the Fritzsche Airport or the Salinas Airport. Again, where is the EA comparison analysis?

#131  
cont.

#132

#133

Thank you for the opportunity to comment on these important MRA EA issues.  
Please do feel free to contact me with any questions you may have.

Mike Weaver  
Chair, The Highway 68 Coalition  
email: [michaelrweaver@mac.com](mailto:michaelrweaver@mac.com)  
phone: 831-484-2243

## Responses to Agency and Individual Comments

### Patti Dunton, Salinan Tribe of Monterey and San Luis Obispo Counties

1. Comment noted. The Draft EA includes an Archaeological Monitoring Plan that specifies the requirements for a cultural resources' monitor (Draft EA, Appendix E).

### Debra L. Hale, Transportation Agency for Monterey County

2. Comment noted. The final design of Olmsted Road improvements would be coordinated with the City of Monterey, and the passenger terminal parking lot would include electric vehicle charging stations. If construction affects State Route 68, a construction permit from the California Department of Transportation (Caltrans) would also be required.

### Stephanie Locke, Monterey Peninsula Water Management District

3. Comment noted.
4. Comment noted. The EA text referred to in this comment has been revised to state, "Based on the water allocation established by MPWMD in June 1993, the Airport has 8.10 acre-feet (AF) of water available ~~remaining of its original allocation for future uses~~ to **offset new and expanded capacity.**" (Final EA, Section 3.3.8.3)
5. Comment noted.

### Alison Kerr, City of Del Rey Oaks

6. Comment noted.
7. The only proposed development on the north side under the Proposed Action is the construction of 51 new GA hangars or hangar pads, an ARFF (i.e., Public Safety building) for on-airport emergencies at the existing north GA apron, and the improvement of the northeast vehicle service road from the terminus of Airport Road by the north GA apron to the existing east vehicle service road.
8. See Topical Response #3. The Airport has determined that a north side location for the ARFF best serves the Airport's needs and provides acceptable response times as mandated by FAA. Operationally, moving the ARFF to the north GA area would remove its emergency activity away from the passenger terminal and fixed base operator areas, which would reduce the amount of congestion on the south side of the airfield.
9. Comment noted.
10. Comment noted.
11. The Airport will continue to provide pertinent outreach through the Airport website as well as other social media platforms.

12. The Proposed Action considered in this EA is a federal action being analyzed under federal environmental laws (i.e., NEPA and other federal “special purpose” laws) for federal funding and approval of an airfield safety enhancement project. The Airport Master Plan, which was analyzed under the *California Environmental Quality Act* (CEQA), was approved by the Monterey Peninsula Airport District Board on November 26, 2018. Therefore, comments regarding the CEQA environmental process related to the Airport Master Plan are outside the scope of the federal EA process and analysis. However, specific items identified in this comment letter may have relevance and are addressed below.
13. See previous response. While the Proposed Action encompasses some of the short-term project components listed in the Airport Master Plan’s capital improvement program, the NEPA environmental review and approval process is an independent environmental process.
14. See Topical Response #3 and response to Comment #15. Section 1.3.3 of the Draft EA states that the relocated ARFF facility “would be provided per FAA requirements.” Given the input from the City of Monterey in this comment letter regarding consistency with the city’s general plan and applicable neighborhood plan policies, once the ARFF is relocated, the north side ARFF will no longer provide off-airport emergency services (see LU-1, Section 4.3.7, Final EA). The cancellation of the city’s current Fire Agreement with the Airport would mitigate the city’s concerns regarding general plan and neighborhood plan policy inconsistencies.
15. See Topical Response #3. The Airport has determined that a north side location for the ARFF best serves the Airport’s needs and provides acceptable response times as mandated by FAA. The ability to serve off-airport emergencies is not part of the purpose and need for this Proposed Action (Draft EA, Section 2.2). In addition, the ARFF locations shown in Figure 3 of this comment do not meet the purpose and need for the Proposed Action (refer to Table 2B and Section 2.5.3 of the Final EA).

An ARFF building located off Henderson Way would not have access to the airfield and, thus, would have a substantial adverse impact on airport operations compared to the Proposed Action alternative. Construction of a new emergency access road to the airfield would require substantial amounts of earthwork, have other construction impacts, and have substantially higher costs compared to the Proposed Action alternative.

An ARFF building located within the rental car lot west of the existing passenger terminal would continue the congestion on the south side of the airfield and would impact rental car operations. The location also has difficult access issues due to the steep terrain immediately south of the car rental lot, which would make it infeasible for ARFF trucks to leave the area on the landside of the new ARFF building. Rather, ARFF trucks would be required to leave the new ARFF building from the airside and travel across the ramp to access Olmsted Road east of the existing terminal. Adding emergency ARFF traffic to the vehicular and aircraft traffic associated with the new passenger terminal and apron would

have a substantial adverse impact on airport operations when compared to the Proposed Action alternative is not considered to be a feasible alternative.

16. See Topical Response #5. FAA-approved projects are required to be consistent with the land use plans of public agencies authorized by the state to plan for development of the area surrounding the Airport. As such, FAA will not approve a Proposed Action that is inconsistent with the City of Del Rey Oak's general plan policies. The Airport will mitigate inconsistencies with the City of Monterey's general or neighborhood plan policies by no longer providing emergency services to the city. See LU-1, Section 4.3.7, Final EA.
17. See Topical Response #4. Section 4.3.10.1 of the Draft EA contains an evaluation of the traffic impacts related to the Proposed Action. The Proposed Action would remove trips from the south side of the Airport and redistribute them to the north side. However, as shown in Table 4Q of the Draft EA, these new "north side" trips would be offset by the removal of existing vehicle trips associated with the leased landscaping storage operations within the proposed north side stockpile areas.
18. See responses to Comments #12, 13, and 17. The Proposed Action is not the same project as was considered in the AMP EIR and would result in a decrease in ADT when compared with the No Action alternative (Draft EA, Section 4.10.3.1). As also stated in Section 4.10.3.1 of the Draft EA, construction traffic would access both sides of the Airport from the south side via Olmsted Road and Highway 68. (See Section 1.3.2 of the Draft EA, which describes the on-airport northeast service road improvement that would be constructed to provide a construction route from the south side of the Airport to the north.) The traffic analysis contained in the AMP EIR is not applicable to the Proposed Action. In addition, vehicle miles travelled (VMT) is not a metric used in analyzing traffic impacts under NEPA by the FAA.
19. See Topical Response #3. Given the input from the City of Monterey in this comment letter regarding consistency with the city's general plan and applicable neighborhood plan policies, once the ARFF is relocated, the north side ARFF will no longer provide off-airport emergency services (see LU-1, Section 4.3.7, Final EA). The cancellation of the city's current Fire Agreement with the Airport would mitigate the city's concerns regarding general plan and neighborhood plan policy inconsistencies.
20. This comment is inaccurate with respect to RV storage leases. As indicated in Section 4.10.3.1 of the Draft EA, the offset for ADT related to relocated hangars on the north side of the Airport would occur due to the removal of existing vehicle trips associated with the leased landscaping storage operations within the proposed north side stockpile areas (refer to Exhibit 1H of the Draft EA). (These leased operations use existing Airport Road [via on-airport "N" Street] to N. Fremont Street.) See Topical Response #4.
21. See Topical Response #4. As shown in the footnote to the table (Table 4Q), an estimated 20 ADT is associated with the current ARFF facility, which includes employee work trips as well as both on- and off-airport emergency trips. ADT for the relocated ARFF would be less as the new ARFF building will be used for on-airport emergency trips only. Staffing at the new ARFF building is also likely to be less. The information in Table 4Q is based on existing traffic counts of the existing southeast GA hangars and the existing north side leased landscaping storage areas as well as existing ARFF incident reports and staffing schedules. While some of these primary sources were also used in the traffic analysis for



- the AMP EIR, the analysis and conclusions are not the same due to the differences in the projects being analyzed for purposes of the environmental analysis.
22. See Topical Response #3. Given the input from the City of Monterey in this comment letter regarding consistency with the city's general plan and applicable neighborhood plan policies, once the ARFF is relocated, the north side ARFF will no longer provide off-airport emergency services (see LU-1, Section 4.3.7, Final EA). The cancellation of the city's current Fire Agreement with the Airport would mitigate the city's concerns regarding general plan and neighborhood plan policy inconsistencies.
  23. See response to Comment #17 and Topical Response #4. The Proposed Action would result in a decrease in ADT over the No Action alternative (Draft EA, Section 4.10.3.1).
  24. See Topical Response #3. Given the input from the City of Monterey in this comment letter regarding consistency with the city's general plan and applicable neighborhood plan policies, once the ARFF is relocated, the north side ARFF will no longer provide off-airport emergency services (see LU-1, Section 4.3.7, Final EA). The cancellation of the city's current Fire Agreement with the Airport would mitigate the city's concerns regarding general plan and neighborhood plan policy inconsistencies.
  25. See Topical Response #2.
  26. See Topical Response #3 and responses to Comments #18, #20, and #21.
  27. See response to Comment #15 and Topical Response #3. The Airport is not responsible for providing off-airport emergency services for the City of Monterey nor is it required to continue to evaluate ARFF locations that are preferred by the city.
  28. See response to Topical Response #5. FAA-approved projects are required to be consistent with the land use plans of public agencies authorized by the State to plan for development of the area surrounding the Airport. As such, FAA will not approve a Proposed Action that is inconsistent with the City of Del Rey Oak's general plan policies.
  29. See response to Comment #15 and Topical Response #3. The Airport is not responsible for providing off-airport emergency services for the City of Monterey nor is it required to continue to evaluate ARFF locations that are preferred by the city.
  30. As stated in Section 4.10.3.1 of the Draft EA, construction traffic would access both sides of the Airport from the south side via Olmsted Road and Highway 68. (See Section 1.3.2 of the Draft EA, which describes the on-airport northeast service road improvement that would be constructed to provide a construction route from the south side of the Airport to the north.)
  31. As indicated in Section 4.10.3.1 of the Draft EA, the offset for ADT related to relocated hangars on the north side of the Airport would occur due to the removal of existing vehicle trips associated with the leased landscaping storage operations within the proposed north side stockpile areas (refer to Exhibit 1H of the Draft EA). This reduction in north side ADT has direct nexus to the Proposed Action as the areas used by leased landscaping storage operations are proposed for stockpile of material removed on the south side of the Airport due to the proposed passenger terminal and apron.
  32. As stated in Draft EA, Section 4.3.5.1, "Currently, fuel delivery to the north GA area is escorted by FBO personnel from the south side of the Airport starting at one of the FBOs to the fuel tank at the north GA apron. This procedure would not change with the proposed relocated tanks." This route is via on-airport vehicle service roads.

33. The Proposed Action provides the replacement of 126,000 square feet (sf) of hangar space on the north GA apron that would be demolished on the southeast GA apron to make room for the relocated passenger terminal and apron. In addition, up to seven additional box hangars could be constructed on hangar building pads (for a net increase of approximately 70,000 sf of hangar space). This net increase is accounted for in the analysis of the Draft EA (see Tables 4D, 4K, 4M, and 4Q). It should be noted that Policy b.5 of the City of Monterey General Plan specifies an increase on “non-aviation” use; aviation hangars are considered an “aviation” use. In addition, as shown in Section 4.10.3.1 of the Draft EA and the response to Comment #17, the Proposed Action would result in a decrease in ADT over the No Action alternative and would, therefore, not “create unnecessary traffic impacts in adjacent residential neighborhoods.”
34. See previous responses to Comments #12 and #13. The Airport Master Plan and its analysis under CEQA are not the subject of this EA. The Proposed Action is not the same as Alternative 2 of the AMP EIR.
35. See response to Comment #15 and Topical Response #3. The Airport is not responsible for providing off-airport emergency services for the City of Monterey nor is it required to continue to evaluate ARFF locations that are preferred by the city. The Airport has determined that a north side location for the ARFF best serves the Airport’s needs and provides acceptable response times as mandated by FAA. The Proposed Action will mitigate impacts to the Casanova Oak Knoll neighborhood and policy inconsistencies with the City of Monterey general plan and applicable neighborhood policies by removing the joint use function of the ARFF once it is relocated to the Airport’s north side.
36. Comment noted. See responses to comments throughout this letter. The Proposed Action will mitigate impacts to the Casanova Oak Knoll neighborhood and policy inconsistencies with the City of Monterey general plan and applicable neighborhood policies by removing the joint use function of the ARFF once it is relocated to the Airport’s north side. See LU-1, Section 4.3.7, Final EA.
37. Comments noted. See additional responses below.

Richard Runicello, Casanova Oak Knoll Neighborhood Association

38. See Topical Response #1.
39. Alternative 2 of the AMP EIR is not the same project as the Proposed Action considered in this EA. Although the AMP EIR Alternative 2 included using Airport Road for access to the north side, the alternative considered was for implementation of the entire Airport Master Plan Concept Development Plan, which also included opportunities for long-term aeronautical and non-aeronautical development. None of this type of development is considered in the Proposed Action, which is the Action analyzed in the EA, which is an airfield safety enhancement project.
40. See Topical Response #5. FAA-approved projects are required to be consistent with the land use plans of public agencies authorized by the State to plan for development of the area surrounding the Airport. As such, FAA will not approve a Proposed Action that is inconsistent with the City of Del Rey Oak’s general plan policies.

41. The traffic analysis provided in the Draft EA is focused on a comparison of the Proposed Action vs. the No Action alternative. Neither alternative includes the demolition and rebuilding of the northwest quadrant of the Airport nor is it included as a foreseeable future project. As such, the analysis of the demolition and rebuilding of the northwest quadrant of the Airport is outside of the scope of this EA.
42. See Topical Response #4. As shown in the Draft EA (Table 4Q) (Final EA, Table N), an estimated additional 92 ADT (weekday) is associated with the Proposed Action on the north side of the Airport based on actual traffic associated with the existing hangars and ARFF facility. These numbers include all types of trips occurring at the hangars during the study period (mechanics, maintenance personnel, deliveries, charters, and guests). Traffic associated with the ARFF facility includes employee work trips as well as both on- and off-airport emergency trips. The information in Table 4Q is also based on existing traffic counts of the north side leased landscaping storage areas.

As indicated in Section 4.10.3.1 of the Draft EA, the offset for traffic related to relocated hangars on the north side of the Airport would occur due to the removal of existing vehicle trips associated with the leased landscaping storage operations within the proposed north side stockpile areas (refer to Exhibit 1H of the Draft EA). This reduction in north side ADT has direct nexus (i.e., cause and effect) to the Proposed Action as the areas used by leased landscaping storage operations are proposed for stockpile of material removed on the south side of the Airport due to the proposed passenger terminal and apron. (ADT for the relocated ARFF would also be less than is occurring at the existing ARFF as the new ARFF building would be used for on-airport emergency trips only. Staffing at the new ARFF building is also likely to be less. As these adjustments were not included in Table 4Q, the actual decrease in ADT due to the Proposed Action is likely to be more than reported.) Since there is no direct nexus between removal of a towing businesses in the northwest quadrant of the Airport and the Proposed Action, the EA does not include any potential decrease in north side ADT due to such future action on the part of the Airport.

43. See Topical Response #1.
44. The Proposed Action considered in this EA is a federal action being analyzed under federal environmental law (i.e., NEPA and other federal “special purpose” laws) for federal funding and approval of an airfield safety enhancement project. As such, comments regarding a state environmental process under a previous EIR are not relevant as part of this federal environmental document. While the Proposed Action encompasses some of the short-term project components listed in the Airport Master Plan’s capital improvement program, the NEPA environmental review and approval process is an independent environmental process.
45. This comment does not provide specific comments on the Draft EA. As a point of clarification, although the Airport has applied for a federal grant, it cannot be approved and the money cannot be used by the Airport unless the Proposed Action’s federal environmental process has been satisfactorily concluded per applicable federal laws and regulations.

### Robert Yoha

46. This comment does not provide specific comments on the Draft EA. As a point of clarification, the Proposed Action considered in this EA is a federal action being analyzed under federal environmental law for federal funding and approval of an airfield safety enhancement project. As such, comments regarding a state environmental process under a previous EIR are not relevant as part of this federal document. The Draft EA public review and comment period was extended an additional 24 days for a total public review period of 56 days. Information regarding the Proposed Action has been made available online via the EA study website ([www.montereyea.airportstudy.com](http://www.montereyea.airportstudy.com)). See also Topical Response # 2, which discusses Airport Road as the single point of access to the north side of the Airport since the 1940s.
47. See Topical Response #1. It appears that this comment may be referencing the AMP EIR, not this Draft EA, as the Proposed Action does not include a north side access road through the City of Del Rey Oaks. The Airport has met with representatives of the cities of Monterey, Del Rey Oaks, and the Casanova Oak Knoll Neighborhood Association (CONA). Refer to Comment #45.
48. This comment does not provide specific comments on the Draft EA. The Proposed Action considered in this EA is a federal action being analyzed under federal environmental law for federal funding and approval of an airfield safety enhancement project. The Airport Master Plan, which was adopted at the local level, is not under consideration. As such, comments regarding the state environmental process related to the Airport Master Plan are not relevant as part of this federal document. As a point of clarification, the Airport does not use City of Del Rey Oaks for fire support but provides its own on-airport firefighting capabilities per federal regulations. The Airport has determined that a north side location for the ARFF best serves the Airport's needs and provides acceptable response times as mandated by FAA. See Topical Response #3.
49. Comment noted.

### Jim and Denise Franco

50. See Topical Responses #2, #3, and #4. As a point of clarification, the Proposed Action does not involve the closures of any small businesses in the northwest quadrant of the Airport. Month-to-month leased landscaping storage operations currently occurring in the north side proposed stockpile locations would be removed (see Draft EA, Section 4.3.10.1 for more details).
51. See Topical Response #1. The Proposed Action encompasses some of the short-term project components listed in the Airport Master Plan's capital improvement program, which was adopted after several years of collaborative planning with airport stakeholders and a lengthy state environmental review process.
52. Comment noted. See Topical Response #5. FAA-approved projects are required to be consistent with the land use plans of public agencies authorized by the State to plan for development of the area surrounding the Airport. As such, FAA will not approve a Proposed Action that is inconsistent with the City of Del Rey Oak's general plan policies.

Scott & Faith Dent, Casanova Oak Knoll Neighborhood Association

53. Comment noted.

54. See Topical Response #3. Given the input from the City of Monterey in this comment letter regarding consistency with the city's general plan and applicable neighborhood plan policies, once the ARFF is relocated, the north side ARFF will no longer provide off-airport emergency services (see LU-1, Section 4.3.7, Final EA). The cancellation of the city's current Fire Agreement with the Airport will mitigate the city's concerns regarding general plan and neighborhood plan policy inconsistencies. The ARFF would be used only for on-airport emergencies, with Airport Road only used for non-emergency ARFF traffic such as deliveries and employee trips. In addition, the Proposed Action would result in a slight decrease in traffic on streets and intersections south and west of the Airport, including on Highway 68 and neighborhood streets within the Casanova Oak Knoll neighborhood.

Kimberle Herring

55. See Topical Response #1.

56. See Topical Responses #1, #2, and #3.

Roman Barnes

57. See Topical Responses #2 and #3.

Harry Christensen

58. See Topical Responses #1, #2, #3, and #5. FAA-approved projects are required to be consistent with the land use plans of public agencies authorized by the State to plan for development of the area surrounding the Airport. As such, FAA will not approve a Proposed Action that is inconsistent with the City of Del Rey Oak's general plan policies.

Forrest Melton & Kristine Tarozzi

59. Comment noted. See Topical Response #3.

60. See Topical Response #5. FAA-approved projects are required to be consistent with the land use plans of public agencies authorized by the State to plan for development of the area surrounding the Airport. As such, FAA will not approve a Proposed Action that is inconsistent with the City of Del Rey Oak's general plan policies. In addition, as a note of clarification, the AMP EIR, which was approved on November 26, 2018 by the Monterey Peninsula Airport Board in compliance with state environmental regulations is not a federal action. While the Proposed Action encompasses some of the short-term project components listed in the Airport Master Plan's capital improvement program, the Proposed Action is not the same project as was considered in the AMP EIR and would result in a decrease in traffic (ADT) over the No Action alternative (Draft EA, Section 4.10.3.1).

61. See Topical Response #3. Traffic counts taken in September reflect an average (or typical) period for landscaping services. Hangar traffic counts taken at the existing south GA area in 2016 represented a time when a flight school was in operation and reflect a high-use period.



62. See Topical Response #1.

Jon Selbicky

63. See Topical Response #3.

Susan Nine

64. See Topical Responses #2 and #3.

Esther Malkin

65. Comment noted. This comment does not address the adequacy of the Draft EA. See Topical Response #2 for information regarding the history of airport access via Airport Road, which predates the Casanova Oak Knoll neighborhood.

Mike Brassfield

66. Comment noted. This comment does not address the adequacy of the Draft EA. See also Topical Responses #3 and #5.

Greg and Claudia Heydeman

67. See Topical Responses #3 and #5.

Kenneth Bear

68. See Topical Response #3.

Ann Kern

69. See Topical Response #5. FAA-approved projects are required to be consistent with the land use plans of public agencies authorized by the State to plan for development of the area surrounding the Airport. As such, FAA will not approve a Proposed Action that is inconsistent with the City of Del Rey Oak's general plan policies.

70. See Topical Response #3. The Proposed Action would result in a decrease in ADT and would not contribute to cumulative traffic in the area.

71. See Topical Responses #3 and #4.

Dan Cutler

72. See Topical Response #2. Airport access via Airport Road predates the development of the Casanova Oak Knolls residential neighborhood.

Joan Reta

73. See Topical Responses #2, #3, and #5.

74. See Topical Response #3.

75. This comment does not address the adequacy of the Draft EA. However, as a point of clarification, federal aviation grants are not funded by taxpayers, but by airport-generated monies such as aviation fuel taxes and passenger facilities charges. Although the Airport has applied for a federal grant, the grant will not be approved and the Airport cannot use the money unless the Proposed Action's federal environmental process has been

satisfactorily concluded per applicable federal laws and regulations. See also Topical Response #1.

No Name Provided

76. Comment noted. This comment does not address the adequacy of the Draft EA.

Dorothy Baumann

77. See Topical Responses #1, #2, #3, and #5.

John Besseling

78. See Topical Responses #2 and #3.

Eric Bernhard

79. See Topical Response #3.

Mike Rausch

80. See Topical Response #1.

Wendy and Mark Milligan

81. See Topical Responses #1 - #3 and #5. The Proposed Action encompasses some of the short-term project components listed in the Airport Master Plan's capital improvement program, which was adopted after several years of collaborative planning with airport stakeholders and a lengthy state CEQA environmental review process. As a point of clarification, the Proposed Action does not involve the closures of any small businesses in the northwest quadrant of the Airport. Month-to-month leased landscaping storage operations currently occurring in the north side proposed stockpile locations would be removed (see Draft EA, Section 4.3.10.1 for more details).

Duane Dykema

82. See Topical Responses #1 and 3.

83. Comment noted. This comment does not address the adequacy of the Draft EA (other than the comments already set forth in Comment #82). See also Topical Response #2 for information regarding the history of airport access via Airport Road, which predates the Casanova Oak Knoll neighborhood.

Denise Franco

84. See Topical Responses #2, #3, and #5. Airport access via Airport Road predates the development of the Casanova Oak Knolls residential neighborhood.

Alan and Sharon Sparkman

85. See Topical Responses #1, #2, #3, and #5.

Louis Algaze

86. Comment noted. However, Airport Road is an existing access road to the Airport. See Topical Responses #2 and #3.

Michael Pekin

87. See Topical Response #1. All EA study materials are available online for review as well as hard copies at the Airport's Administrative Office.

Richard Jensen & Jaimem Rosarion

88. See Topical Responses #2 and 3.

Sandra Bear

89. See Topical Responses #2, #3, and #5.

James Gilliland

90. See Topical Responses #2, #3, and #5.

Barbara Lind Hirst

91. See Topical Responses #1, #2, and #3. As a point of clarification, the public comment period for the Draft EA opened on March 6, 2020.

Mike Rausch (2<sup>nd</sup> letter)

92. See Topical Responses #2, #3, and #5. Note: Comments regarding improvements on N. Fremont Street do not address the adequacy of the Draft EA and, thus, no response is necessary or required as part of this EA process.

Forrest Melton and Kristine Tarozzi (2<sup>nd</sup> letter)

93. See Topical Response #1. (Note: All other comments in this letter have been provided previously. See responses to Comments #59-62.)

Lisa Duggan

94. See Topical Response #3. The traffic analysis is based on existing traffic counts taken in September, which reflect an average (or typical) period for landscaping services, while the hangar traffic counts were taken at the existing south GA area in 2016, which represented a time when a flight school was in operation and reflect a high-use period. In addition, the traffic analysis considered ARFF trips that included off-airport emergency services. Since this would no longer occur, project traffic generation has arguably been over-stated in the analysis.

95. See Topical Responses #2, #3, and #5.

Nina Beety

96. As discussed in Section 4.3.9 of the Draft EA, temporary construction noise would occur on an intermittent basis only and would not exceed the FAA noise threshold of a 1.5 decibel (dB) CNEL (Community Noise Equivalent Level) increase in noise within or above

the 65 CNEL for noise-sensitive land uses. However, avoidance and minimization measures are identified in the EA since at least some of the expected construction activity would occur during nighttime hours or could occur within 400 feet of a residential area (The Oaks condominiums). Night-time construction work is planned only for construction on the areas within the runway and taxiway system and their associated safety zones to avoid the need to close the runway during more active daytime hours. See Draft EA, Section 4.3.9, NOI-2 for avoidance and minimization measures.

Captain R.A. Wiley (transmitted by Marlana Brown), U.S. Department of the Navy, Naval Support Activity Monterey (with attachments)

97. Comment noted. See Topical Responses #3 and #5. Because FAA-approved projects are required to be consistent with the land use plans of public agencies authorized by the State to plan for development of the area surrounding the Airport, FAA will not approve a Proposed Action that is inconsistent with the City of Del Rey Oak's general plan policies. As a result, public access to the north GA area for the Proposed Action would continue via the Airport's existing access via Airport Road to N. Fremont Street for the planned north side improvements, namely, for tenant access to 51 GA hangars and employees or deliveries for the ARFF. These planned improvements would reduce overall vehicular trips through the Casanova Oak Knoll neighborhood, especially trips by heavy trucks. This is because vehicular trips associated with the GA tenants and ARFF employees would be offset by the removal of vehicular trips associated with month-to-month leased landscaping storage operations currently occurring in the north side proposed stock pile locations (see Draft EA, Section 4.3.10.1 for more details). (Note: Any development on the north side of the Airport beyond what is included in this EA, i.e., 51 GA hangars, a relocated ARFF building for on-airport emergencies, and the northeast vehicle service road improvements, will be subject to their own additional federal review, as applicable.)

Juan Manuel Ezcurra

98. Comment noted. The Airport has determined that a north side location for the ARFF best serves the Airport's needs and provides acceptable response times as mandated by FAA. Operationally, moving the ARFF to the north side would remove its emergency activity away from the passenger terminal and fixed base operator areas, which would reduce the amount of congestion on the south side of the airfield. The permanent ARFF location on the north side meets FAA standards for response times on a Part 139-certificated airport.

Roxanne Buck

99. Comment noted. See Response to Comment #98.

Carol Kaplan

100. Comment noted. See Response to Comment #98.

Cindy Hickey

101. Refer to Section 4.3.2 and Appendix C of the Draft EA. Impacts to protected biological resources have been vetted with the United States Fish and Wildlife Service and a mitigation program has been approved to prevent potentially significant impacts.
102. Comment noted. The Proposed Action does not include a north side road through Del Rey Oaks.

Ella Ezcurra

103. Comment noted. See Response to Comment #98.

Margo Ezcurra

104. Comment noted. See Response to Comment #98.

Alexis Naficy

105. Comment noted.

Wayne Marien & Elizabeth Stacey

106. Comment noted. See Response to Comment #98.
107. Comment noted. Air quality, impacts related to hazardous materials, and noise impacts from the Proposed Action are evaluated in the following sections of the Draft EA, respectively: Section 4.3.1, 4.3.5, and 4.3.9. Cumulative impacts of these resource areas are addressed in Section 4.4.

Cristofer and Shelley Cabanillas

108. Comment noted.

Arlen Grossman

109. Comment noted. Note: While the Proposed Action encompasses some of the short-term project components listed in the Airport Master Plan's capital improvement program, the use of Airport Road for the Proposed Action does not involve all future activity contemplated by the AMP EIR. Any development on the north side of the Airport beyond what is included in this EA, i.e., 51 GA hangars, a relocated ARFF building for on-airport emergencies, and the northeast vehicle service road improvements, will be subject to their own additional federal review, as applicable.

Kimberly Shirley

110. Comment noted.
111. Comment noted. See Response to Comment #98. See also Topical Response #3.
112. Comment noted. Soil borings were taken as part of the geotechnical investigation on the north side of the Airport for the AMP EIR. Groundwater was not encountered and is likely very deep or present only in isolated perched layers. Thus, groundwater would not be affected by construction activities of the Proposed Action on the north side. On the south side in the areas of the passenger terminal relocation, groundwater is shallower. (References: Cornerstone Earth Group 2017, *Preliminary Geotechnical*



*Investigation for Monterey Peninsula Airport Terminal Building, Parking Structure, Apron Area, and North Side Improvement Areas*, March 29; Cornerstone Earth Group 2018, Follow up letter report to Kimley-Horn Associates, Mr. Melvin and Mr. Hamilton, RE: Preliminary Geotechnical Investigation - Supplemental Comments, Monterey Peninsula Airport Terminal Building, Apron Area, and North Side Improvements Areas, Salinas Highway (68) and Olmstead Road, Monterey California, dated May 28). A timeline of per- and polyfluoroalkyl substances (PFAS) groundwater clean-up at the Airport is not available as the work plan submitted to the California Department of Water Resources is under review and has not been approved. However, all required protective gear and construction practices required by the work plan, when approved, would be followed. The Proposed Action would not exacerbate the existing condition, which is the same for both the No Action and Proposed Action alternatives considered in this EA.

Ken Rutherford

- 113. Comment noted. However, the Proposed Action is a safety project that should not be delayed. The Proposed Action has three specific safety purposes and needs: 1) enhance the operational safety of the Runway 10R-28L taxiway system; 2) remove existing structures that currently have an adverse effect on navigable airspace around the runway (Part 77 obstruction); and 3) reduce the crossover airport traffic. As stated in Section 1.4.1 of the Draft EA, grant assurances are specific conditions required by FAA. Grant Assurance 19 states, in part, that an airport shall be operated at all times in accordance with the minimum standards required by applicable federal agencies.
- 114. Comment noted.
- 115. Comment noted. See Response to Comment #98.

Alice Angell Green

- 116. Comment noted; however, the Airport is an existing land use that predates the surrounding residences, which were built in the 1950s. See Topical Responses #2 and #3.

Douglas Mackenzie

- 117. See response to Comment #112. An PFAS analysis to identify potential PFAS on Airport property has been prepared consistent with legal requirements. The Airport will continue to comply with any additional requirements relating to PFAS. The Proposed Action would not exacerbate the existing condition, which is the same for both the No Action and Proposed Action alternatives considered in this EA.

Karen Harris

- 118. See response to Comment #96. Night-time construction work is planned only for construction on the areas within the runway and taxiway system and their associated safety zones to avoid the need to close the runway during more active daytime hours. NOI-2 of the Draft EA identifies avoidance and minimization measures that would be followed.

119. Refer to Section 4.3.2 and Appendix C of the Draft EA. Impacts to protected biological resources have been vetted with the United States Fish and Wildlife Service and a mitigation program has been approved to prevent significant impacts.
120. See response to Comment #96. As a point of clarification, PFAS is typically located in groundwater, not surface water. All surface waters would be contained as required by Regional Water Quality Control Board permits per state and federal regulations.
121. As described in the Draft EA Project Description, all but seven of the 51 hangars proposed are replacing existing hangars located on the south side of the apron. In addition, hangars are defined as an aviation use, not a non-aviation use. See Topical Response #3 regarding emergency uses of the relocated ARFF facility. No oak trees would be removed from the proposed open space buffer identified in the AMP EIR by the Proposed Action.
122. See Topical Responses # 3 and #4. The Airport has determined that a north side location for the ARFF best serves the Airport's needs and provides acceptable response times as mandated by FAA. Operationally, moving the ARFF to the north side would remove its emergency activity away from the passenger terminal and fixed base operator areas, which would reduce the amount of congestion on the south side of the airfield. The permanent ARFF location on the north side meets FAA standards for response times on a Part 139-certificated airport.
123. The project considered in the AMP EIR is not the same project as the Proposed Action considered in this EA. The Proposed Action considered in this EA is a federal action being analyzed under federal environmental law (i.e., NEPA and other federal "special purpose" laws) for federal funding and approval of an airfield safety enhancement project. While the Proposed Action encompasses some of the short-term project components listed in the Airport Master Plan's capital improvement program, the Airport Master Plan Concept Development Plan also included opportunities for long-term aeronautical and non-aeronautical development. None of this type of development is considered in the Proposed Action, which is an airfield safety enhancement project.
124. There is no known contamination in the dirt within the construction areas of the Proposed Action. However, Section 4.3.5.1 of the Draft EA includes HAZ-1, which states "During construction, if previously unknown contaminants are discovered or a spill occurs, work shall be halted, and the National Response Center notified, where applicable. Per the Airport's hazardous materials business response plan, the Airport shall immediately report any release or threatened release of hazardous materials to the Monterey County (County) Health Department and the Officer of Emergency Services." See also response to Comment #112. A timeline of PFAS clean-up at the Airport is not available as the work plan submitted to the California Department of Water Resources is under review and has not been approved. However, all required protective gear and construction practices required by the work plan, when approved, will be followed. The Proposed Action would not exacerbate the existing condition, which is the same for both the No Action and Proposed Action alternatives considered in this EA.
125. Comment noted.

Susan Ragsdale-Cronin

126. Comment noted. This comment does not include specific comments on the adequacy of the Draft EA.

Mike Weaver, The Highway 68 Coalition

127. The Notice of Availability contains a summary of the Proposed Action and is not intended to replace the more detailed information contained in the EA document itself.
128. As outlined within paragraph 706.f of FAA Order 5050.4B, concise analysis was undertaken only for potential impacts that the alternatives under consideration may cause. The project study area is located within the Airport's boundaries and, thus, the Proposed Action would have minimal impacts to the scenic highway. Section 4.3.11.2 of the Draft EA discusses potential visual impacts and identifies avoidance and minimization measures. See also Draft EA, Exhibit 4E.
129. The Proposed Action is a safety enhancement project, not an airport expansion project. No changes to the capacity of the airfield or runway system are proposed.
130. See Section 4.3.8.3 of the Draft EA as well as information in Comment #3 (Monterey Peninsula Water Management District). The Airport has sufficient water allocations to meet the demand for this project. In addition, both the new terminal and the new ARFF would incorporate sustainability measures.
131. The Airport District was created in March 1941 to manage and operate the Airport and airport lands by a state legislative act (Senate Bill No. 1300). FAA has no jurisdiction over land use in the state of California.
132. This comment is beyond the scope of this EA, which is on a proposed safety enhancement project for the Monterey Regional Airport.
133. Refer to Section 4.3.2 and Appendix C of the Draft EA. Impacts to protected biological resources have been vetted with the United States Fish and Wildlife Service and a mitigation program has been approved to prevent significant impacts. An airport-to-airport comparison is beyond the scope of this EA.

**HISTORIC RESOURCES ASSESSMENT AND SURVEY  
REPORT, MONTEREY REGIONAL AIRPORT,  
MONTEREY, CALIFORNIA**

Prepared for:

**Coffman Associates**  
4835 East Cactus Road  
Scottsdale, Arizona 85254

Prepared by:

Debi Howell-Ardila, MHP  
Steven Treffers, MHP  
Shannon Carmack, BA  
John Dietler, PhD, RPA

**SWCA Environmental Consultants**  
150 South Arroyo Parkway, 2nd Floor  
Pasadena, California 91105  
(626) 240-0587  
www.swca.com

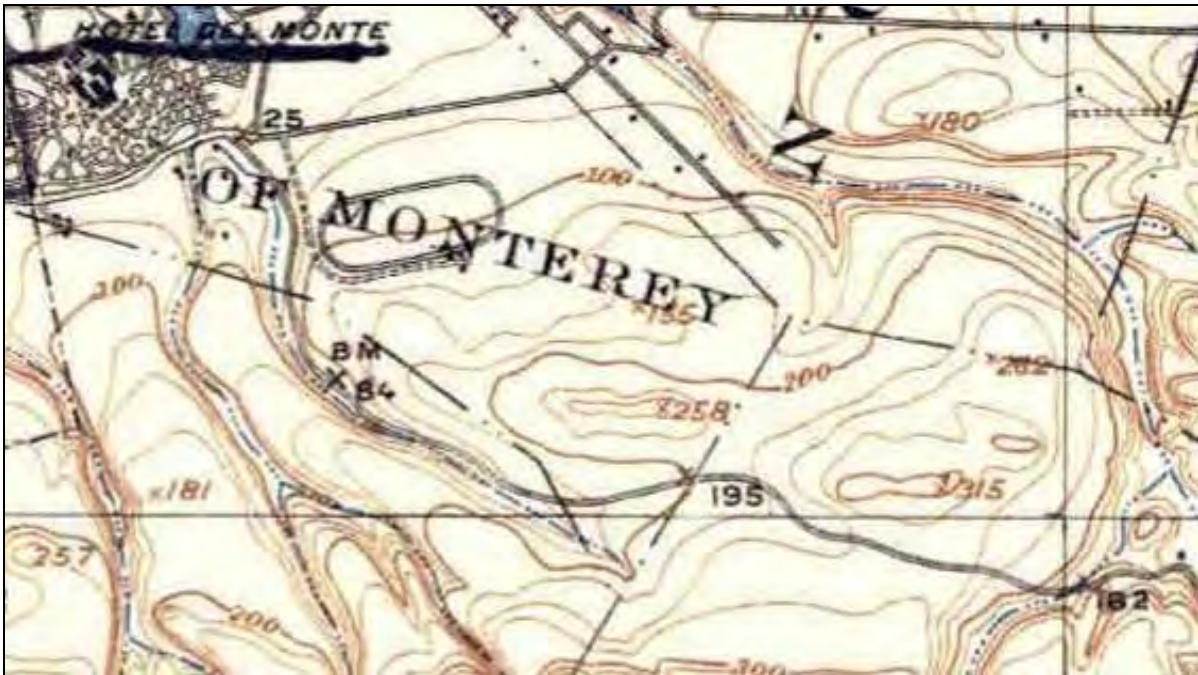
Contact:

Shannon Carmack – Project Manager  
scarmack@swca.com

USGS 7.5-minute topographic quadrangle  
Seaside, California

SWCA Project No. 027400.00  
SWCA Cultural Resources Report Database No. 14-281

August 2014



**Figure 3.** Future site of the Monterey Regional Airport and vicinity, shown in 1913 topographical map. Source: Environmental Data Resources, Inc. ([www.edrnet.com](http://www.edrnet.com)).

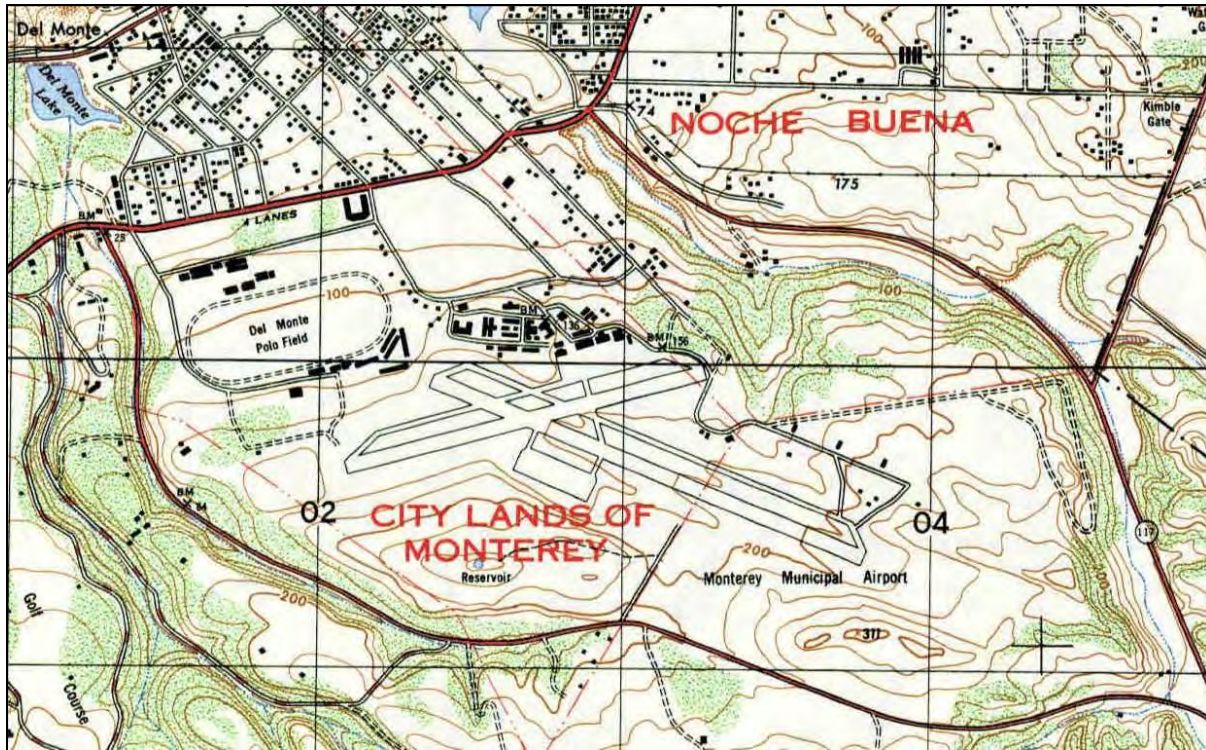


**Figure 4.** 1947 topographical map. Following World War II, the Monterey Regional Airport returned to offering commercial flights. Source: Environmental Data Resources, Inc. ([www.edrnet.com](http://www.edrnet.com)).



ATTACHMENT 1

Historic Resources Assessment and Survey Report, Monterey Regional Airport,  
City and County of Monterey, California



**Figure 5.** 1950 topographical map. Until 1949/1950, with the construction of the terminal, most buildings and structures remained concentrated in the airport's northern portion. Source: Environmental Data Resources, Inc. ([www.edrnet.com](http://www.edrnet.com)).



**Figure 6.** 1956 aerial photograph. Development of the southern portion of the airport remained sparse through the 1950s. Source: Environmental Data Resources, Inc. ([www.edrnet.com](http://www.edrnet.com)).

**AGREEMENT TO PROVIDE FIRE SERVICES BETWEEN  
THE CITY OF MONTEREY AND  
MONTEREY PENINSULA AIRPORT DISTRICT**

**THIS AGREEMENT**, is made and executed on April 16, 2019, by and between the CITY OF MONTEREY, a municipal corporation, hereinafter referred to as "Monterey", and the MONTEREY PENINSULA AIRPORT DISTRICT, a Special District, hereinafter referred to as "Airport" (collectively referred to as "the Parties"), and provides as follows:

**RECITALS**

**WHEREAS**, the Airport's Board of Directors has determined that the most effective method of providing fire and emergency services within its jurisdiction is through a contract for fire services model; and

**WHEREAS**, the Monterey and Airport recognize that Monterey will benefit from a shared fire and emergency services delivery model due to the resulting improvement in service to the area of Monterey along the Highway 68 corridor. In consideration of that benefit, Monterey agrees to share in the actual cost of providing fire and emergency services as detailed in the Fire Service Fee charged by Monterey to Airport as set forth in this Agreement.

**WHEREAS**, both Parties have determined that the most effective method of providing the fire and emergency services to the Airport and the East section of Monterey would be for Monterey to provide the service from Airport's facility; and

**WHEREAS**, it is the desire of the Parties to address, by this Agreement, all matters which are related to the fire services to be provided to the Airport by Monterey; and

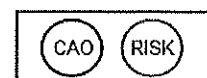
**WHEREAS**, this Agreement was authorized by the Monterey City Council on April 16, 2019, by the passage of Resolution 19-048 C.S.; and

**WHEREAS**, this Agreement was authorized by the Airport's Board of Directors on March 13, 2019, by the passage of a Resolution; and

**WHEREAS**, this Agreement is entered into pursuant to Government Code § 54981 and § 55632.

**AGREEMENT**

**NOW, THEREFORE**, for and in consideration of the mutual advantages and covenants set forth below, it is agreed by and between the Parties as follows:

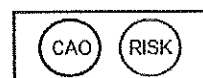


**ARTICLE I  
DEFINITIONS**

- 1.1. **Capital Improvements.** "Capital Improvements" means and refers to structural repairs and similar improvements in excess of \$25,000 that are the type of improvements which would be added to the tax "basis" if the property were owned by a non-governmental entity.
- 1.2. **Capital Equipment.** "Capital Equipment" means and refers to capital equipment, each asset in excess of \$5,000, which are the types of equipment required to perform the necessary Aircraft Rescue and Fire Fighting tasks on the Airport.
- 1.3. **Chief Fire Officer.** "Chief Fire Officer" means and refers to employees of the Monterey Fire Department with permanent appointment in the classification of Division Chief, Assistant Fire Chief, or Fire Chief.
- 1.4. **Code 3.** "Code 3" means and refers to the emergency response of a fire apparatus utilizing all warning equipment as authorized in Section 25252 et seq. of the California Vehicle Code.
- 1.5. **Fire Chief.** "Fire Chief" means and refers to the City of Monterey Fire Chief.
- 1.6. **Fire Services.** "Fire Services" means and refers to those services described in Article IV hereof.
- 1.7. **Fiscal Year.** "Fiscal Year" means and refers to the annual period commencing on July 1 and ending the following June 30.
- 1.8. **Term.** "Term" means and refers to any period of time during which Monterey is obligated to provide services pursuant to this Agreement.

**ARTICLE II  
TERM OF AGREEMENT**

- 2.1. **Initial Term.** The initial Term of the provision of services under this Agreement shall be from 7:45 a.m. on July 1, 2019 through 7:45 a.m. on July 1, 2024.
- 2.2. **Extension of Term.** This Agreement may, by resolution of both the Monterey City Council and the Airport Board of Directors, be extended for additional five (5) year increments no later than the December 31 immediately preceding the Agreement's expiration.
- 2.3. **Termination.** Notwithstanding Section 2.1, or Section 2.2 of this Agreement, either Party may terminate this Agreement by providing twelve (12) months' written notification to the other Party, and the Term of this Agreement or any extension thereof shall be shortened accordingly. Written notification of termination shall be delivered to the other Party's City Manager or Executive Director pursuant to Section 9.5 of this Agreement, with duplicate notification delivered to the Fire Chief.





2.4. **Termination for Material Breach.** Notwithstanding Sections 2.1 through 2.3 of this Agreement, this Agreement may be terminated for material breach pursuant to the procedures set forth in Section 6.1(e) of this Agreement.

**ARTICLE III  
FACILITIES AND EQUIPMENT**

3.1. **Title.** Airport shall retain title to all existing real property, buildings, equipment and apparatus owned by Airport and described in Exhibit A to this Agreement.

3.2. **Use of Real Property, Equipment and Apparatus.** For the duration of this Agreement, Airport shall lease to Monterey all real property, buildings, equipment and apparatus described in Exhibit A to enable Monterey to provide services to Airport pursuant to this Agreement as well as to provide local mutual and automatic mutual aid, statewide master mutual aid and assistance by hire pursuant to the California Fire Assistance Agreement. Airport further authorizes Monterey to utilize any apparatus described in Exhibit A outside the geographic boundaries of Airport whenever deemed operationally necessary by the Fire Chief or his or her designee, provided the apparatus is used as part of a response to a callout for service or in support of another station providing fire protection service. Use of Airport Rescue and Fire Fighting (ARFF) apparatus in this capacity specifically requires pre-authorization of the Airport Executive Director or his or her designee, and will not violate FAA fire safety regulations for Airport operations at that point in time. This Agreement shall serve as the lease instrument without additional consideration.

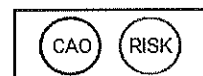
(a) Upon termination of this Agreement pursuant to Section 2.3 or Section 2.4, Monterey shall deliver to Airport the real property, buildings, equipment and apparatus described in Exhibit A, in the same condition in which it was originally provided to Monterey allowing for reasonable wear and tear.

(b) Airport shall provide Monterey the square footage necessary for Monterey to provide the Fire Services contemplated by this Agreement as determined by the Parties. The Parties shall meet to ensure the facilities are adequate for Monterey personnel located at the Airport fire station.

(c) In the event that the Airport desires to modify the configuration of the Airport fire station to accommodate Airport's needs, the Parties shall meet to determine a functional solution for the Parties. Any construction costs, temporary facilities costs, or any other costs related to a modification of the Airport fire station needed to accommodate the Airport's needs shall be the responsibility of the Airport.

3.3. **Maintenance and Repair.** Monterey shall bear all costs to maintain and repair real property, buildings and equipment leased from the Airport, as outlined in Exhibit A, and used for the provision of fire services to the Airport.

Notwithstanding the foregoing, with respect to the ARFF apparatus, Monterey shall bear all costs related to regular and routine preventative maintenance and corrective maintenance (M1, M2, and M3 Maintenance Interval Operations as described in the Rosenbauer Rapid-Intervention Vehicle Maintenance Manual). As to all other repairs, District and Monterey will share all costs equally. District and Monterey will each set aside \$50,000 in their respective annual budgets to pay for all repairs to the ARFF apparatus other than regular and routine preventative maintenance and corrective maintenance items.



A maintenance services committee, with at least one member from the Airport, shall be utilized to consider all maintenance and repair issues regarding the equipment listed on Exhibit A, including selection of qualified and specific contractors to perform necessary maintenance and repairs. Monterey shall provide Airport with monthly maintenance records related to all maintenance performed pursuant to this Paragraph.

**3.4. Replacement.** Monterey shall bear all costs to replace expendable/consumable materials and supplies, as well as small tools and equipment used for the provision of fire services. In the event that any capital improvements and/or capital equipment (real property, building, equipment and apparatus) leased by Monterey, as outlined in Exhibit A, and used for the provision of fire services to the Airport pursuant to this Agreement require replacement, replacement is the responsibility of the Airport.

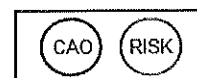
**3.5. Damages.** Should an insurable event result in damage to any real property, buildings, equipment and apparatus, the Airport shall only bear the portion of the repair/replacement cost that exceeds the amount of any payment for damage received under the insurance coverage, and any deductible. If, however, the damage is caused by Monterey's employees and due to lack of training or safety and oversight procedures, or if the damage was preventable, or if the damage was due to negligence or intentional disregard of procedures, then Monterey shall bear 100% of the cost to return the damaged property to its pre-accident condition.

**3.6 Building Inspection.** A final joint building inspection will be completed on or before June 30, 2019. In consideration of any noted maintenance and repair requirements, Monterey acknowledges that the premises shall be received in good repair and will repair any damage, including broken windows, done to the premises during Monterey's occupancy, excluding normal wear and tear. Monterey shall maintain structure in good condition and make all necessary structural repairs including the roof, walls, window frames, gutters and downspouts. The final joint building inspection will include testing of all major appliances in the premises, including but not limited to the furnace, water heater and kitchen appliances, to ensure they are all in good working order before June 30, 2019. Airport will ensure that the building and related systems are working and in acceptable condition. After acceptance, Monterey will be responsible for maintenance and repair as pursuant to Section 3.3.

**3.7 Other Stored Materials.** The Airport Police Department's evidence/storage locker that is located in the Airport Fire Department facility will remain the liability of the Airport. The Airport Police Department is responsible to appropriately secure the contents of this area according to all laws, policies and procedures.

#### ARTICLE IV DUTIES OF MONTEREY UNDER THIS AGREEMENT

**4.1. Scope of Services.** Monterey shall provide Fire Services within the jurisdictional area of Airport as more specifically described in Section 4.2 of this Article. In providing such services, Monterey shall administer the provisions of the Airport and Federal Aviation Administration (FAA) rules, regulations, policies and procedures as applicable to aircraft firefighting and rescue. Structural firefighting, emergency medical services and all other fire department services will follow all applicable federal, state and local regulations as adopted by the Airport and Monterey.





(a) Monterey agrees to meet and consult with Airport relative to service levels, fees for services, operational policies and/or procedures, and/or any other issue or concern relative to Monterey's implementation of the provisions of this Agreement. Monterey further agrees to meet and discuss Monterey labor relations issues with Airport Management relating to this Agreement to the extent permitted by law.

(b) Monterey agrees to receive and consider any input from the Airport Executive Director relative to the performance of the Fire Chief as it pertains specifically to the provision of services pursuant to this Agreement, including the Fire Chief's responsiveness to the Airport Executive Director regarding and airport community on fire services-related issues or concerns.

(c) Monterey agrees to solicit and consider input from the Airport Executive Director relative to the selection process for future Fire Chief(s). Such input shall include the opportunity to review and provide comment on the Fire Chief Job Description, Fire Chief recruitment announcement, and participation on an interview panel to provide input on candidates. Notwithstanding the foregoing, the City Manager for Monterey has the exclusive and final authority to appoint a Fire Chief.

**4.2 Description of Fire Services to be provided by Monterey.** Monterey's duties to provide Fire Services under this Agreement shall be as follows:

(a) Fire Department Administration. Monterey shall provide the following administrative and support services necessary to maintain Fire Services within the Airport's jurisdiction:

(i) Fire Services program planning and administration consistent with the terms and conditions of this Agreement and other usual and customary conditions in use by City for its fire services.

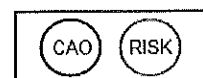
(ii) Development and administration of the annual Airport Fire Services budget.

(iii) Coordination and administration of Airport Fire Services sub-department-level programs as authorized and funded within the Airport fire services budget, as that budget may be modified from year to year.

(iv) Delivery and documentation of all federal and state-mandated firefighter training as well as provision of supplemental training as authorized and funded within the Airport fire services budget, as that budget may be modified from year to year.

(v) Provision of a Chief Fire Officer or qualified acting Chief Fire Officer, or if no Chief Fire Officer is available, a Company Officer or qualified acting Company Officer, to assist with emergency and disaster management within the Airport Emergency Operations Center as requested by the Airport Executive Director or his or her designee.

(vi) Operational integration and coordination of specialized Airport fire suppression services to meet the FAA Aircraft Rescue and Fire Fighting (ARFF) for the Monterey Airport Operational Index as certified by the FAA, as per the current Code of Federal Regulations (CFR) Part 139, as amended.



(vii) Fire Chief's or designated Chief Fire Officer representative's prompt response to requests by the Airport Executive Director, attendance at Airport Board meetings, executive management meetings, airport community events, or other meetings or forums as requested by the Airport Executive Director.

(viii) Notification to the Airport Executive Director or designee as soon as practical of any significant emergency event or other event as defined by the Airport Executive Director.

(ix) Maintenance of sufficient, segregated records relating to provision of Fire Services to Airport, including but not limited to, response time data for all incident responses as described in Section 4.2(c) of this Agreement. At a minimum, such records shall be sufficient to meet any and all federal and state reporting obligations as they relate to the provision of Fire Services, including but not limited to annual audits, mutual aid, and reimbursement for disaster response, hazardous material response or other incident responses. Such records may be maintained in Monterey, and will be provided to Airport upon request or termination of this Agreement for any reason as described in Sections 2.4 or 2.5 of this Agreement.

(xi) Installation and maintenance of Information Technology (IT) software and equipment to support Fire Services delivery and related operations as determined by the Fire Chief.

(b) Fire Prevention Services.

(i) Monterey will conduct plan reviews of all construction and development to ensure compliance with applicable fire and life safety codes and regulations, as well as inspection of all new fire protection and fire alarm systems for compliance with applicable codes and standards adopted by the authority having jurisdiction, and inspection of previously installed fixed fire protection and alarm systems as recommended by applicable standards adopted by the authority having jurisdiction.

(ii) Annual fire safety inspections of all state-mandated occupancies within the Airport District.

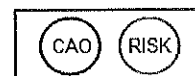
(iii) Issuance of operational permits and associated inspection of applicable businesses within the Airport as required in Appendix Chapter 1, Section 105.6 of the 2015 California Fire Code and as that Section may be amended in the future.

(iv) Fire safety inspection of non-mandated or permitted business occupancies, and tenant hangar spaces shall occur annually in cooperation with Airport staff.

(v) Investigation of all fires to establish origin and cause as well as coordination with the Airport Police Department on any criminal prosecution resulting from such investigations.

(vi) Development and Plan Review. Monterey will provide all pre-development Fire Code and plan review on an as-needed basis to ensure compliance with the Fire Codes as adopted by the Airport.

(c) Incident Response within the Geographic Boundaries of the Airport.



(i) General Service Criteria. The following criteria shall apply to all services identified in Section 4.2(c)(ii)-(vii):

(A) Response Area. Monterey shall provide services identified in Sections 4.2(c)(ii)-(vii) below to all areas within the geographic boundaries of the Airport.

(B) Chief Officer Coverage. Monterey shall provide a qualified Chief Fire Officer, or acting Chief Fire Officer, to be immediately available for response and management of emergency incidents as necessary to provide incident command and coordination functions within the jurisdictional boundaries of the Airport District, including the authority to commit emergency expenditure of Airport funds to mitigate an emergency incident consistent with the ordinances, policies and procedures of Airport and in consultation with the Airport Executive Director or his or her designee.

In the event that this service is not immediately available because the on-duty Monterey Duty Chief Officer is otherwise committed to another emergency incident, an administrative Chief Officer or off-duty Operations Chief Officer shall be recalled and assigned to provide operational Duty Chief Officer coverage as soon as possible.

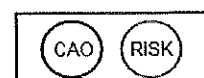
(C) Fire Station Staffing.

(1) Monterey shall assign four (4) personnel, whose training and certifications meet minimum FAA and state-mandated training requirements for their respective classifications and responsibilities, to the Airport fire station to provide Fire Services pursuant to this Agreement each and every hour of the Term of this Agreement. Said staffing shall include one (1) Captain or qualified Acting Captain, two (2) Engineers or qualified Acting Engineers, and one (1) Firefighter. Monterey will pay the cost of required Airport Rescue and Fire Fighting (ARFF) Training, as determined by Monterey, which occurs during the term of this Agreement. All assigned staffing by Monterey in excess of that outlined in this paragraph shall be at the sole cost and expense of Monterey, unless the additional staffing was requested in writing by the Executive Director of Airport.

(2) Additional qualified fire personnel may be assigned to the Airport station as determined by the Fire Chief or designee to provide supplemental Fire Services or staffing for special events, anticipated weather events, or other situations within the Airport Fire Services budget as that budget may be modified from year to year, and within operational capacity.

(3) Monterey shall ensure that all Fire Operations staff assigned and/or reporting to the Airport Fire Station have obtained prior appropriate Secured Identification Display Area (SIDA) clearance levels to respond to all areas within the geographic boundaries of the Airport District.

(D) Response Time and Reporting. Monterey commits to meet and/or exceed the required ARFF response times for all incidents governed by the FAA Part 139 requirements. For all other emergency responses, Monterey commits to meet and/or exceed the emergency (Code 3) response times to incidents within the Airport District from crew notification to first unit on scene within five (5) minutes or less from time of receipt of alarm, 90% of the time.



(E) Dispatch Service. Monterey shall be responsible for all maintenance and operation of the emergency dispatch and communications systems at the Airport fire station.

(ii) Fire Suppression. Monterey will provide firefighting response to all reported fires, suspected fires, and fire alarm activations on the Airport.

(iii) Emergency Medical Response. Monterey will provide fire department response to all medical emergencies on the Airport in conformance with the Monterey County Emergency Medical Services Agency policies and protocols.

(iv) Rescue Services. Monterey will provide fire department response to any report of a trapped person. Said rescue services shall only be provided within the scope of training and qualifications of fire response personnel, Monterey Fire Department policies and/or Standard Operating Guidelines, and available rescue equipment.

(v) Hazardous Materials Response. Monterey will provide fire department response to any reported hazardous substance spill or release; Airport shall be responsible for seeking reimbursement from the party responsible for the spill or release, and shall indemnify, hold harmless and defend the City of Monterey against any claim, cause of action, disability, loss, liability, damage, cost or expense, however arising, which occurs by reason of an unauthorized discharge, spill, or release of any substance endangering the public safety or causing a public nuisance. The indemnity in this paragraph shall not apply if the hazardous substance spill or release was caused by the negligence or willful misconduct of Monterey.

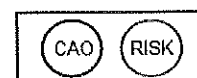
(vi) Other Requests for Service. Monterey will provide fire department response to any other emergency or non-emergency request for service as received and dispatched by the Monterey County Department of Emergency Communications and as consistent with services provided within Monterey.

(vii) Emergency Operations Center Support. In the event the Airport Emergency Operations Center is activated pursuant to the Airport Emergency Operations Plan, Monterey will, to the extent possible, provide fire department support to the Airport Emergency Operations Center (EOC). In the event of a multi-jurisdictional emergency or disaster, coordination of fire resources may be performed from the Monterey Emergency Operations Center.

(d) Statewide Mutual Aid and Assistance by Hire. Monterey may respond to requests for mutual aid or assistance-by-hire by other agencies within the State of California pursuant to the California Statewide Master Mutual Aid Agreement or the California Fire Assistance Agreement, as approved by the Fire Chief or his/her authorized designee. Monterey shall credit or reimburse Airport for any reimbursement(s) received by Monterey relating to use of Airport-owned apparatus described in Exhibit A for provision of mutual aid or assistance-by-hire, except for any operating or incidental costs paid by Monterey.

(e) Miscellaneous.

(i) Public Outreach and Education. Consistent with operational capacity and the Airport fire services budget as that budget may be modified from year to year, Monterey shall



coordinate the planning and development of fire prevention and safety education programs for businesses, Airport community associations, and other members of the Airport District. Fire prevention and life safety programs will be tailored to educate the Airport business community in order to help preserve life and property.

(ii) Code Enforcement. Monterey will assist in enforcement of Airport codes and ordinances related to services provided by Monterey.

(iii) Fire Hydrant Testing. Monterey shall continue to work with the water system owner and water management district to test all public fire hydrants within Airport.

(iv) Utilities. Monterey will pay for the cost of basic utilities to the Airport Fire Station that include electricity, natural gas, water, waste/sewage and solid waste removal.

**4.3. Inspection of Airport-Owned Property and Notification of Necessary Maintenance and Repairs.** Monterey agrees to regularly inspect all real property, buildings, equipment and apparatus described in Exhibit A to ensure they meet the appropriate and applicable fire services standards.

(a) In the event that any real property, buildings, equipment or apparatus described in Exhibit A requires routine maintenance or is in a condition that presents an immediate or imminent threat to employees or public health or safety, Monterey agrees to immediately implement remedy/resolution of such conditions.

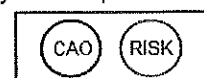
(i) Monterey shall not use any equipment and apparatus requiring maintenance or repair in the provision of Fire Services pursuant to this Agreement until such time as maintenance or repair has been satisfactorily performed, unless such use does not create an undue safety hazard or cause further damage to the equipment or apparatus.

(ii) Monterey shall ensure that access to any real property or buildings described in Exhibit A, which is in a condition that presents an immediate or imminent threat to employee or public health or safety, is restricted so as to minimize the threat posed to employee or public health or safety until said condition is remedied.

(iii) In the event that a condition gives rise to an immediate or imminent threat to public or employee health or safety, the Parties agree that the Fire Chief, or his/her designee, shall have the authority to take any actions necessary to preserve public or employee health or safety. Such action may include prohibiting the occupancy or use of anything described in Exhibit A until the conditions giving rise to the threat are remedied.

(b) In the event that Monterey determines, pursuant to Section 3.3 of this Agreement, that maintenance or repair of any Airport-owned apparatus or equipment described in Exhibit A will not be sufficient to ensure that said apparatus or equipment meets applicable fire service standards, or in the event of planned apparatus or equipment replacement, Monterey shall coordinate the procurement of any such apparatus or equipment with Airport as authorized in the Airport's capital budget as that budget may be modified from year to year.

(i) In the event that Monterey notifies Airport of a condition requiring the replacement of any real property, buildings, equipment, or apparatus described in Exhibit A of this Agreement, Airport shall reserve the right to have such need for replacement validated by an independent





third party of its choice, at no cost to Monterey, within a reasonable time period as mutually agreeable to the Parties.

**ARTICLE V  
DUTIES OF AIRPORT UNDER THIS AGREEMENT**

5.1. **Payment for Fire Services.** Airport shall compensate Monterey for the provision of Fire Services and fire service related support and one-time implementation costs as further described in Section 6.3 of this Agreement.

5.2. **Capital Improvements/Capital Equipment.** Airport agrees to replace capital assets (real property, buildings, equipment and apparatus) leased to Monterey as defined in Article 1.

(a) In the event that Airport fails to respond in a timely manner (within two normal business days) to notification pursuant to this section, Monterey may undertake the necessary capital replacement. Airport agrees to reimburse Monterey for any costs it so incurs, including applicable administrative expenses, associated with any such capital replacement.

(b) In the event that a third-party contractor is hired to perform any necessary maintenance, repair or replacement pursuant to this Agreement, such third-party contractor shall have general liability insurance with minimum limits of \$1,000,000 per occurrence and \$2,000,000 in the aggregate. Both Airport and Monterey shall be named as additional insureds via endorsement on any such coverage, and any such contract with a third-party contractor shall contain a provision whereby the contractor agrees to defend and hold harmless, both Airport and Monterey, from any liability, suit, cause of action, or other legal proceeding (including attorney's fees and costs) which may be brought or claimed against Airport and/or Monterey as a result of contractor's performance or failure to perform under said contract.

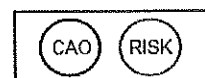
5.4 **Crash Phone.** Airport agrees to provide, at no cost to Monterey, the emergency service connection between the Air Traffic Control Tower (ATCT) and the Airport Fire Station.

**ARTICLE VI  
FEES FOR SERVICES**

6.1. **Fees for Services.** Airport agrees to compensate Monterey for all services provided pursuant to the terms and conditions of this Agreement.

(a) Fee Schedule. Fees for service shall be as follows for the term of this Agreement:

FY 2019-2020	\$1,613,074.00
FY 2020-2021	\$1,503,322.00
FY 2021-2022	\$1,344,720.00
FY 2022-2023	\$1,344,720.00
FY 2023-2024	\$1,344,720.00 +/- Paragraph 6.1(b) True-Up



(b) True – Up. Beginning with Fiscal Year 2022–2023 Monterey will provide to the Airport, no later than November 15, 2023, an Independent Audit identifying the actual and total cost of providing fire protection services from the Airport station during the previous year. In addition, the audit shall include a breakdown of station call-outs to identify the percentage of calls on Airport property for the preceding three years. The true-up applied to the Airport’s annual fee shall be calculated as identified in Exhibit B. The true-up shall be applied to the year following the trued-up year (thus the fee for FY2023-2024 shall be adjusted by the amount of the true-up for FY2022-2023).

(c) Payment Terms. Beginning on July 15 of every Fiscal Year, and on the first day of each month of the Fiscal Year thereafter, Airport agrees to remit to Monterey one twelfth (1/12) of the Fiscal Year Fire Service Fee. Notwithstanding the foregoing, in the first fiscal year that Fire Services are provided pursuant to this Agreement, the initial payment shall be due on the 15<sup>th</sup> day of the first month that Monterey provides Fire Services to Airport, and the amount of the payments will be prorated based on the number of whole and partial months that service is provided to Airport during the first Fiscal Year.

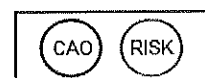
(d) Interest on Delinquent Payments. In the event that Airport fails to pay the entire amount described in section 6.1(c) within thirty (30) days of the due date, interest shall accrue to the unpaid balance at an annual equivalent rate equal to the Prior Year Penalty Factor, determined from the date the payment was originally due. The Prior Year Penalty Factor shall be the interest rate earned on Monterey’s entire investment portfolio for the preceding Fiscal Year plus two percent (2%). For example, if the rate of return on Monterey’s entire investment portfolio for the preceding Fiscal Year was four percent (4%) the Prior Year Penalty Factor will be six percent (6%).

(e) Terms of Material Breach. Failure by Airport to pay the amount(s) due pursuant to Section 6.1(c) plus the interest due pursuant to Section 6.1(d) within three (3) months of the due date shall constitute a material breach of this Agreement in accordance with Section 2.4 herein. Notwithstanding Article II of this Agreement, in the event of such material breach, Monterey shall have the right to terminate this Agreement upon the provision to Airport of three (3) months written notice of said termination, and the Term of this Agreement or any extension thereof shall be shortened accordingly. The termination shall not be effective if Airport pays Monterey all amounts due within thirty (30) days of such notice. Termination of this Agreement pursuant to this section shall not be construed to limit the right of Monterey to obtain, by any means available at law, any monies due to it from Airport pursuant to this Agreement.

6.2. **Transferred Sick Leave Balance.** Parties agree that, per their previous agreement, Monterey took on an obligation of transferred sick leave for the employees that were hired from the Airport. As of July 1, 2019, the outstanding balance due Monterey by the Airport is \$79,864.42. Airport will continue to make payments on an annual basis at a rate of 25% per year for a period of four (4) years until Monterey is 100% compensated for the total initial value of the Sick Leave Liability.

6.3. **Fire Service Related Support Costs.** Airport agrees to pay the following one-time expenses in addition to the standard Fees for Services and Transferred Leave Balances, as set forth in Sections 6.1 and 6.2:

(a) Radio Upgrades. Airport will pay the one-time cost to upgrade existing mobile radios as shown in the chart below. Because the base station radio is a shared benefit, Monterey will pay for 80% of that radio and the Airport will pay for 20%. Monterey will purchase and install that radio; the Airport’s cost share is built into the first year contract service charges. Monterey will coordinate the purchase and installation of the radios.



Location	Number of Radios
Fire station (base station radio)	1
Structure engine (E16)	1
ARFF16	1
Reserve ARFF	1
Utility vehicle (UT16)	1

(b) Satellite and Cellular Phones. Airport will pay the total cost of one (1) satellite phone and monthly service charges to be located on Command Vehicle #6390. Monterey is responsible to pay for the cost and monthly charges for cell phones assigned to all Airport station apparatus.

(c) Communications Dispatch Fees. Monterey will pay all Monterey County Communications Dispatch Fees on behalf of the Airport Fire Station. If this Agreement expires, lapses or is terminated, Airport will assume all responsibility and costs to maintain emergency communications dispatch services.

**ARTICLE VII  
PERSONNEL**

**7.1. Article Intentionally Omitted**

**ARTICLE VIII  
INDEMNIFICATION AND INSURANCE**

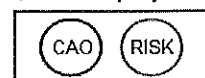
**8.1 Mutual Indemnification.**

(a) Each Party shall indemnify, defend and hold harmless the other Party, to the extent allowed by law and in proportion to fault, against any and all third-party liability for claims, demands, costs or judgments (direct, indirect, incidental or consequential) involving bodily injury, personal injury, death, property damage or other costs and expenses (including reasonable attorneys' fees, costs and expenses) arising or resulting from the acts or omissions of its own officers, agents, employees or representatives carried out pursuant to the obligations of this Agreement.

(b) Each Party shall protect, defend, indemnify and hold harmless the other Party (including their officials, employees and agents as the same may be constituted now and from time to time hereafter) from and against any and all liabilities, losses, damages, expenses or costs, whatsoever (including reasonable attorneys' fees, costs and expenses), which may arise against or be incurred by the other Party as a result of or in connection with any actual or alleged breach of this Agreement by either Party.

(c) Notwithstanding the foregoing Sections 8.1(a) and (b), Airport shall remain liable for its own real and personal property damage (including, without limitation, autos, equipment, and apparatus, since it is retaining ownership of, insurable interests therein, and insurance on its property).

(d) Monterey shall be responsible for all third-party liability, including third-party property damage, caused by the negligence or wrongful acts of Monterey officers, officials, and employees



resulting from Monterey's operation of Airport vehicles and equipment, or resulting from maintenance performed by Monterey pursuant to Section 5.2(c) of this Agreement.

(e) Except for any duties either Party owes to the other pursuant to the provisions of this Agreement, nothing in this Agreement shall be construed to waive any legal protections or immunities available to the Parties under state or federal law.

(f) Accordingly, the Parties hereby expressly agree to waive the pro rata risk allocation contained in California Government Code Section 895.6.

**8.2 Mutual Indemnification Obligations Survive Termination.** As to activities occurring or being carried out in performance of this Agreement and during the Term of this Agreement, the obligations created by Section 8.1 shall survive termination of this Agreement.

**8.3 Public Liability and Property Insurance.**

(a) Each Party shall maintain in effect, at its own cost and expense, throughout the Term of this Agreement and any extensions thereof, the following insurance coverage provided either through a bona fide program of self-insurance, commercial insurance policies, or any combination thereof:

(i) Commercial general liability or public liability with minimum limits of \$10,000,000 per occurrence.

(ii) Auto liability including owned, leased, non-owned, and hired automobiles, with a combined single limit of not less than \$10,000,000 per occurrence.

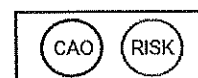
(iii) If a Party employs others in the performance of this Agreement, that Party shall maintain Workers' Compensation in accordance with California Labor Code section 3700 with a minimum of \$1,000,000 per occurrence for employer's liability, for the duration of time that such workers are employed.

(iv) All risk property insurance, excluding earthquake and flood unless feasible, on all permanent property of an insurable nature in an amount sufficient to cover at least 100% of the replacement costs of said property. In any event, Airport shall maintain property insurance coverage for all the real property, buildings and personal property, including equipment and apparatus described in Exhibit A.

(b) All insurance required by this Agreement shall:

(i) Be placed (1) with companies admitted to transact insurance business in the State of California and with a current A.M. Best rating of no less than A:VI or with carriers with a current A.M. Best rating of no less than A:VII; or (2) disclosed self-insurance with limits acceptable to the other Party.

(ii) Provide that each Party's insurance is primary and non-contributing insurance to any insurance or self-insurance maintained by the other Party and that the insurance of the other Party shall not be called upon to contribute to a loss covered by a Party's insurance.



(c) Prior to July 1, 2019, each Party shall file certificates of insurance with the other Party evidencing that the required insurance is in effect.

8.4 **Immunity Preservation.** Nothing in this Agreement shall be read as waiving or limiting any defense to claims of liability otherwise available to fire personnel, and/or public employees, such as the defense of qualified immunity. Nothing in this Agreement shall be read as intending to create or creating a higher duty of care on the part of either Airport or Monterey, or their officers, than would otherwise exist under existing law and the involved Party's own policies, practices, and procedures.

## ARTICLE IX MISCELLANEOUS

9.1 **Amendments to Agreement.** No part of this Agreement shall be altered or amended without written Agreement of the signatory Parties, except that the following sections of the Agreement may be amended by mutual written Agreement of the Monterey City Manager and the Airport Executive Director:

(a) Section 4.2 – Duties of Monterey under this Agreement unless such amendment results in a substantive change in scope of services; and

(a) Section 4.3 – Duties of Airport under this Agreement unless such amendment results in a substantive change in scope of services; and

(b) Sections 6.1, 6.2, and 6.3 relative to methodology used to establish fees for services, and Fire Service Related Support.

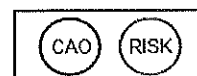
(c) Section 9.4 - Exhibits attached to and incorporated into this Agreement.

9.2 **Assignment.** The rights and obligations of the Parties under this Agreement are not assignable and shall not be delegated without the prior written approval of the Parties.

9.3 **Dispute Resolution.** The Parties recognize that this Agreement cannot represent a complete expression of all issues that may arise during the performance of the Agreement. Accordingly, Monterey and Airport agree to meet and confer in good faith over any issue not expressly described herein to the end that Airport will obtain the best Fire Services possible under the most favorable economic terms and that Monterey will be fairly and adequately compensated for the services it provides hereunder.

It is the Parties' intention to avoid the cost of litigation and to resolve any issues that may arise amicably if possible. To that end, the Parties agree to meet within ten (10) business days of a request made by the other Party in writing to discuss the issues and attempt to resolve the dispute. If the dispute is not resolved after that meeting, the Parties agree to mediate the dispute within 30 calendar days of the meeting or as soon thereafter as possible. The mediator will be chosen by mutual Agreement of the Parties. The costs of mediation will be borne by the Parties equally. No Party may initiate litigation prior to the conclusion of mediation. In any litigation brought related to this Agreement, the prevailing Party shall be entitled to recover its actual costs and attorney fees pursuant to California Civil Code section 1717.

9.4 **Exhibits.** The following Exhibits are attached hereto and incorporated as if fully set forth herein:





ATTACHMENT 2

Exhibit A: Airport Facilities and Equipment Leased to Monterey. This Exhibit shall be updated at least annually to include any new real property, buildings, equipment and apparatus acquired since the previous version, and any real property, buildings, equipment, or apparatus no longer in service and used to provide services pursuant to this Agreement.

Exhibit B: Airport Fee True-Up Methodology

9.5 **Notices.** All notices required or permitted hereunder shall be deemed sufficiently given if delivered by hand, electronic mail, or by United States mail, postage prepaid, addressed to the Parties at the addresses set forth below or to such other address as may, from time to time, be designated in writing.


To Airport: Executive Director  
Monterey Regional Airport  
200 Fred Kane Drive #200  
Monterey, CA 93940

To Monterey: City Manager  
Monterey City Hall  
580 Pacific Street  
Monterey, CA 93940

\* \* \* \* \*

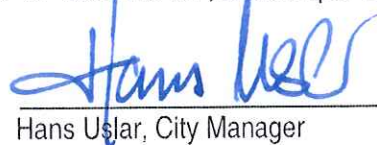
IN WITNESS WHEREOF, the Parties execute this Agreement hereto on the day and the year first written above.

MONTEREY PENINSULA AIRPORT DISTRICT, A Special District

By:   
Michael LaPier, Executive Director

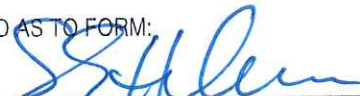
Date: 8/10/2019

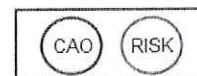
CITY OF MONTEREY, A Municipal Corporation

By:   
Hans Uslar, City Manager

Date: 08/10/19

APPROVED AS TO FORM:

By:   
District Counsel, Monterey Peninsula Airport District



## MEMORANDUM

**From:** Bob Hamilton, PE, Kimley-Horn and Associates  
**To:** Chris Morello, Monterey Regional Airport  
**Date:** October 7, 2019  
**Re:** **Monterey Airport Traffic Data Collection – Monterey, California**

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The purpose of this memorandum is to present a summary of the findings from data collection along N Road and Airport Road in the Monterey Regional Airport District. The study area includes Airport Road, from Aviation Lane to Airport Way, and N Road, from Airport Road to Airport Circle, in the Monterey Regional Airport District in Monterey, California.

### Background

Airport Road and N Road are roads which service the business that reside in the northern section of the Monterey Regional Airport District. Airport Road provides access via Fairgrounds Road, North Fremont Street and Euclid Avenue to the City of Monterey and the greater regional transportation network.

**Figure 1** shows the Project Vicinity Map.

### Data Collection

The presented data was collected between Saturday, September 21, 2019 and Saturday, September 27, 2019. Vehicle Speed, Vehicle Classification and vehicle counts were collected 24-hours a day for seven days at N Road, see **Figure 1** for location.

Video count data was collected between Tuesday, September 24, 2019 to Wednesday September 25, 2019 from 8 AM to 6 PM. Vehicle origin-destination data was collected by type for the California Towing and Transport Company using the video count data, see **Figure 1** for location.

#### *N Road Data Collection*

##### *Vehicle Volume*

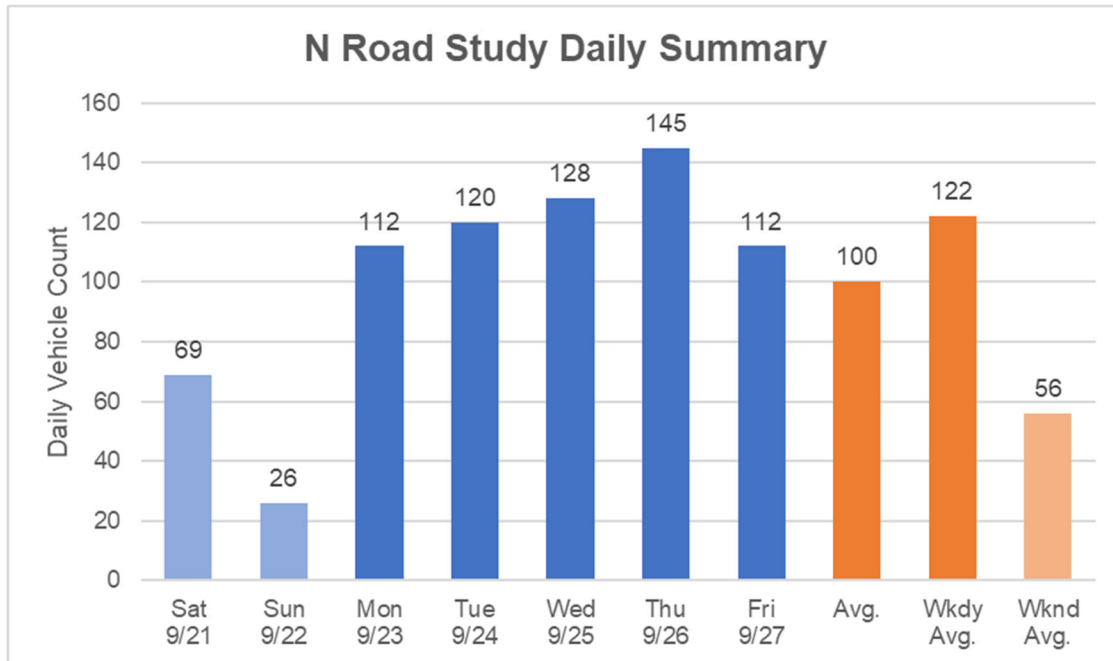
During the study period, 712 vehicles were counted over the course of a week, there was an average of 122 vehicles per weekday and 56 vehicles per weekend day that use N Road. **Table 1** summarizes the AM peak hour, PM peak hour, and daily traffic counts for the N Road location. **Figure 2** illustrates the daily vehicle count during the study period.

**Table 1 – N Road Vehicle Volume Summary during the peak period**

N Road	AM Peak Hour			PM Peak Hour			Daily Total
	Time	Count	% of Daily	Time	Count	% of Daily	
Sat 9/21	7:00 AM	8	12%	4:00 PM	8	12%	69
Sun 9/22	8:00 AM	4	15%	2:00 PM	6	23%	26
Mon 9/23	7:00 AM	25	22%	4:00 PM	14	13%	112
Tue 9/24	7:00 AM	29	24%	4:00 PM	14	12%	120
Wed 9/25	7:00 AM	27	21%	1:00 PM	18	14%	128
Thu 9/26	7:00 AM	28	19%	1:00 PM	18	12%	145
Fri 9/27	7:00 AM	35	31%	4:00 PM	15	13%	112
<b>Average</b>	7:00 AM	22	22%	4:00 PM	12	12%	100
<b>Weekday Average</b>	7:00 AM	29	24%	4:00 PM	15	12%	122
<b>Weekend Average</b>	7:00 AM	5	9%	2:00 PM	7	13%	56

Source: Kimley-Horn & Associates, 2019

**Figure 2 – N Road Study Daily Vehicle Count Summary, during study period.**

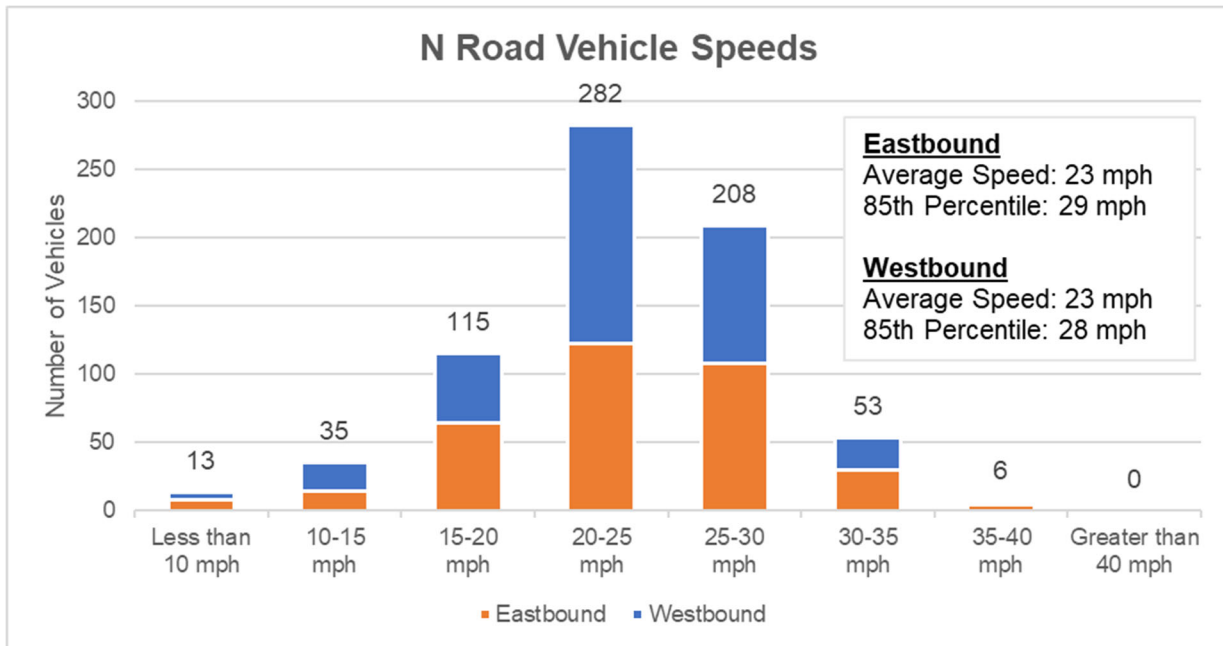


Source: Kimley-Horn & Associates, 2019

**Vehicle Speeds**

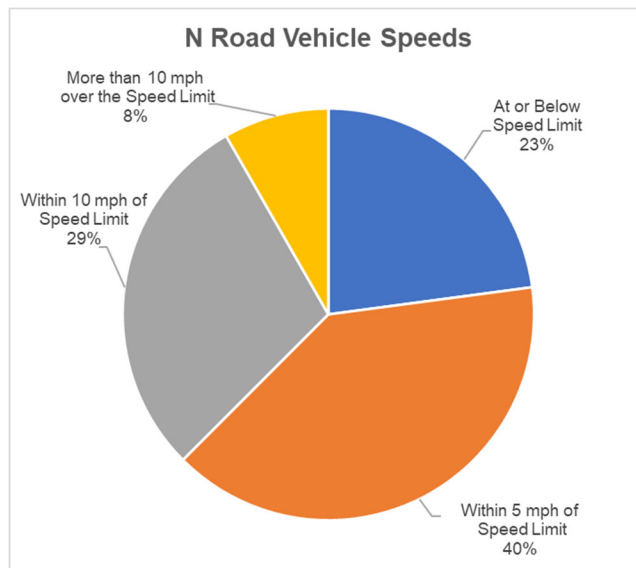
During the study period, speed data was collected for all 712 vehicles counted on N Road. The posted speed limit throughout the study area is 20 miles per hour mph. The median speed at the N Road study location was 23 mph and the 85<sup>th</sup> Percentile speed was 29 mph. The 85<sup>th</sup> percentile speed is of note because in the State of California the 85<sup>th</sup> percentile speed is typically the recommended posted speed. The 85<sup>th</sup> percentile speed is the speed at or below which 85 percent of the motorists drive on a given road unaffected by slower traffic or poor weather. This speed indicates the speed that most motorists on the road consider safe and reasonable under ideal conditions. **Figure 3** and **4** illustrate the speed profile of N Road.

**Figure 3 – Speed Profile of N Road, during study period.**



Source: Kimley-Horn & Associates, 2019

**Figure 4 – Speed Profile of N Road, during study period.**



Source: Kimley-Horn & Associates, 2019

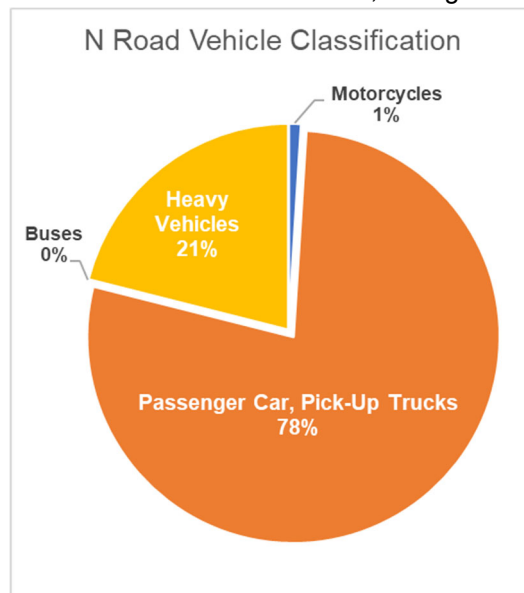
### Vehicle Classification

Vehicle Classifications were collected using the Federal Highway Administration (FHWA) Vehicle Classification assumptions. **Table 2** summarizes the number of vehicles counted in each vehicle classification category over the course of the study period week. **Figure 5** illustrates the vehicle types on found on N Road during the study period. **Figure 6** illustrates examples of vehicles by FHWA Vehicle Classifications. Of note is the Heavy Vehicle Percentage, the heavy vehicle percentage is the proportion of heavy vehicles out of total traffic and is typically considered as vehicles within FHWA Class 5-13, if buses are not called out specifically they may be added into the heavy vehicle category. Heavy vehicle percentage is important in the estimation of pavement design life.

**Table 2** – N Road FHWA Vehicle Classification Summary, during the peak period

FHWA Vehicle Classification	Total
Class 1 - Motorcycles	7
Class 2 - Passenger Cars	249
Class 3 - Other Two-Axle, Four-Tire Single Unit Vehicles	306
Class 4 - Buses	0
Class 5 - Two-Axle, Six-Tire, Single-Unit Trucks	127
Class 6 - Three-Axle Single-Unit Trucks	19
Class 7 - Four or More Axle Single-Unit Trucks	0
Class 8 - Four or Fewer Axle Single-Trailer Trucks	0
Class 9 - Five-Axle Single-Trailer Trucks	0
Class 10 - Six or More Axle Single-Trailer Trucks	2
Class 11 - Five or fewer Axle Multi-Trailer Trucks	0
Class 12 - Six-Axle Multi-Trailer Trucks	0
Class 13 - Seven or More Axle Multi-Trailer Trucks	2

**Figure 5** – N Road Vehicle Classification, during the study period



































Source: Kimley-Horn & Associates, 2019

Note: Motorcycles = FHWA Class 1, Passenger/Pick-Up Trucks = FHWA Class 2-3, Buses = Class 4, and Heavy Vehicles = Class 5 to 13



Figure 6 – FHWA Vehicle Classifications

<b>Class 1</b> Motorcycles		<b>Class 7</b> Four or more axle, single unit	
<b>Class 2</b> Passenger cars		<b>Class 8</b> Four or less axle, single trailer	
			
			
			
<b>Class 3</b> Four tire, single unit		<b>Class 9</b> 5-Axle tractor semitrailer	
			
			
<b>Class 4</b> Buses		<b>Class 10</b> Six or more axle, single trailer	
			
			<b>Class 11</b> Five or less axle, multi trailer
<b>Class 5</b> Two axle, six tire, single unit		<b>Class 12</b> Six axle, multi-trailer	
			
			<b>Class 13</b> Seven or more axle, multi-trailer
<b>Class 6</b> Three axle, single unit			
			
			

Source: Federal Highway Administration (FHWA)



### California Towing and Transportation Company

Video data collection was collected on Tuesday September 24 to Wednesday September 25, 2019. The video collected information on the number of vehicles originating or ending a vehicle trip at the towing company office or company vehicle lot. Location A shown on **Figure 1** is the Towing Company Vehicle Lot and the Location B is the Towing Company Office. On Tuesday September 24<sup>th</sup>, 49 vehicles trips are attributed to the CA towing Company, and on September 25<sup>th</sup>, 31 vehicle trips were attributed to the CA towing Company. Tow Truck Trips account for over half the vehicle trips, on Tuesday 53% of the trips were made by a Tow truck and on Wednesday it was 68%. **Tables 3** and **4** summarize the vehicle trips between California Towing Company locations between 8:00 AM and 6:00 PM for Tuesday September 24<sup>th</sup> and Wednesday, September 25<sup>th</sup> respectively.

**Table 3 – Tuesday, September 24<sup>th</sup> Vehicle Count Data**

Tue, Sept 24 <sup>th</sup>	Total						Total
	Offsite to Lot	Lot to Office	Lot to Offsite	Offsite to Office	Office to Lot	Office to Offsite	
8:00 AM				1			1
8:30 AM							0
9:00 AM							0
9:30 AM							0
10:00 AM				1		1	2
10:30 AM				4	1	1	6
11:00 AM			4	1	1	2	8
11:30 AM						1	1
12:00 PM				3		1	4
12:30 PM				2		3	5
1:00 PM			1		1	1	3
1:30 PM							0
2:00 PM				2			2
2:30 PM				1	1		2
3:00 PM			1	1		1	3
3:30 PM						2	2
4:00 PM				2			2
4:30 PM				2	3		5
5:00 PM						2	2
5:30 PM			1				1
<b>Total</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>20</b>	<b>7</b>	<b>15</b>	<b>49</b>

Source: Kimley-Horn & Associates, 2019

**Table 4 – Tuesday, September 24<sup>th</sup> Vehicle Count Data**

Wed, Sept 25 <sup>th</sup>	Total						Total
	Offsite to Lot	Lot to Office	Lot to Offsite	Offsite to Office	Office to Lot	Office to Offsite	
8:00 AM							
8:30 AM				1			1
9:00 AM						1	1
9:30 AM				3		2	5
10:00 AM						1	1
10:30 AM				1			1
11:00 AM				3	1		4
11:30 AM		1	1	1	2	2	7
12:00 PM			1				1
12:30 PM				1		2	3
1:00 PM							
1:30 PM	1						1
2:00 PM				1			1
2:30 PM				1		1	2
3:00 PM							
3:30 PM	1						1
4:00 PM							
4:30 PM							
5:00 PM						2	2
5:30 PM							
<b>Total</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>12</b>	<b>3</b>	<b>11</b>	<b>31</b>

Source: Kimley-Horn & Associates, 2019

**Attachments:**

Figure 1 – Vicinity Map

Appendix A: Traffic Counts





**LEGEND**

- # Video Data Collection
- # Tube Count Data Collection

Source: Google Earth, 2019



Figure 1  
Vicinity Map  
Monterey Airport Traffic Data Collection

# APPENDIX A

## TRAFFIC COUNTS





## Vehicle Classification Report Summary

**Location:** N Rd, E/O Airport Rd  
**Count Direction:** Eastbound / Westbound  
**Date Range:** 9/21/2019 to 9/27/2019  
**Site Code:** 01

	FHWA Vehicle Classification													Total Volume
	1	2	3	4	5	6	7	8	9	10	11	12	13	
<b>Study Total</b>														
<b>Eastbound</b>	2	113	154	0	79	2	0	0	0	0	0	0	0	350
<b>Percent</b>	0.6%	32.3%	44.0%	0.0%	22.6%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100%
<b>Westbound</b>	5	136	152	0	48	17	0	0	0	2	0	0	2	362
<b>Percent</b>	1.4%	37.6%	42.0%	0.0%	13.3%	4.7%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%	0.6%	100%
<b>Total</b>	7	249	306	0	127	19	0	0	0	2	0	0	2	712
<b>Percent</b>	1.0%	35.0%	43.0%	0.0%	17.8%	2.7%	0.0%	0.0%	0.0%	0.3%	0.0%	0.0%	0.3%	100%

FHWA Vehicle Classification	
Class 1 - Motorcycles	Class 8 - Four or Fewer Axle Single-Trailer Trucks
Class 2 - Passenger Cars	Class 9 - Five-Axle Single-Trailer Trucks
Class 3 - Other Two-Axle, Four-Tire Single Unit Vehicles	Class 10 - Six or More Axle Single-Trailer Trucks
Class 4 - Buses	Class 11 - Five or fewer Axle Multi-Trailer Trucks
Class 5 - Two-Axle, Six-Tire, Single-Unit Trucks	Class 12 - Six-Axle Multi-Trailer Trucks
Class 6 - Three-Axle Single-Unit Trucks	Class 13 - Seven or More Axle Multi-Trailer Trucks
Class 7 - Four or More Axle Single-Unit Trucks	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Saturday, September 21, 2019  
 Eastbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	3	0	0	0	0	0	0	0	0	0	0	0	0	3
7:00 AM	0	2	2	0	1	0	0	0	0	0	0	0	0	0	5
8:00 AM	0	3	0	0	0	0	0	0	0	0	0	0	0	0	3
9:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
10:00 AM	0	2	1	0	1	0	0	0	0	0	0	0	0	0	4
11:00 AM	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
1:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
2:00 PM	0	3	0	0	1	0	0	0	0	0	0	0	0	0	4
3:00 PM	0	0	1	0	1	0	0	0	0	0	0	0	0	0	2
4:00 PM	0	0	4	0	1	0	0	0	0	0	0	0	0	0	5
5:00 PM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
6:00 PM	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
7:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>16</b>	<b>11</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>34</b>
<b>Percent</b>	<b>2.9%</b>	<b>47.1%</b>	<b>32.4%</b>	<b>0.0%</b>	<b>17.6%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Saturday, September 21, 2019  
 Westbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
7:00 AM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	3
8:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
9:00 AM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	3
10:00 AM	0	2	0	0	1	0	0	0	0	0	0	0	0	0	3
11:00 AM	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	3	0	0	0	0	0	0	0	0	0	0	0	0	3
1:00 PM	0	3	0	0	0	0	0	0	0	0	0	0	0	0	3
2:00 PM	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
3:00 PM	0	1	1	0	1	0	0	0	0	0	0	0	0	0	3
4:00 PM	0	1	1	0	1	0	0	0	0	0	0	0	0	0	3
5:00 PM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
6:00 PM	0	2	0	0	0	0	0	0	0	0	0	0	0	0	2
7:00 PM	1	2	1	0	0	0	0	0	0	0	0	0	0	0	4
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>19</b>	<b>11</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>35</b>
<b>Percent</b>	<b>5.7%</b>	<b>54.3%</b>	<b>31.4%</b>	<b>0.0%</b>	<b>8.6%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Sunday, September 22, 2019  
 Eastbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
8:00 AM	0	0	2	0	0	0	0	0	0	0	0	0	0	0	2
9:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
1:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
3:00 PM	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
4:00 PM	0	1	0	0	1	0	0	0	0	0	0	0	0	0	2
5:00 PM	0	2	0	0	0	0	0	0	0	0	0	0	0	0	2
6:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>6</b>	<b>5</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>13</b>
<b>Percent</b>	<b>0.0%</b>	<b>46.2%</b>	<b>38.5%</b>	<b>0.0%</b>	<b>15.4%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Sunday, September 22, 2019  
 Westbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
8:00 AM	0	0	2	0	0	0	0	0	0	0	0	0	0	0	2
9:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
3:00 PM	0	2	0	0	0	0	0	0	0	0	0	0	0	0	2
4:00 PM	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
5:00 PM	0	1	0	0	0	1	0	0	0	0	0	0	0	0	2
6:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>6</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>13</b>
<b>Percent</b>	<b>0.0%</b>	<b>46.2%</b>	<b>46.2%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>7.7%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	



ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Monday, September 23, 2019  
 Eastbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	1	2	0	1	0	0	0	0	0	0	0	0	0	4
7:00 AM	0	6	8	0	1	0	0	0	0	0	0	0	0	0	15
8:00 AM	0	1	3	0	0	0	0	0	0	0	0	0	0	0	4
9:00 AM	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
10:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	0	3	0	2	0	0	0	0	0	0	0	0	0	5
1:00 PM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	3
2:00 PM	0	0	1	0	1	0	0	0	0	0	0	0	0	0	2
3:00 PM	0	0	3	0	0	0	0	0	0	0	0	0	0	0	3
4:00 PM	0	0	4	0	3	0	0	0	0	0	0	0	0	0	7
5:00 PM	0	2	3	0	0	0	0	0	0	0	0	0	0	0	5
6:00 PM	0	2	0	0	0	0	0	0	0	0	0	0	0	0	2
7:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>16</b>	<b>31</b>	<b>0</b>	<b>9</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>56</b>
<b>Percent</b>	<b>0.0%</b>	<b>28.6%</b>	<b>55.4%</b>	<b>0.0%</b>	<b>16.1%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Monday, September 23, 2019  
 Westbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	1	7	0	1	1	0	0	0	0	0	0	0	0	10
8:00 AM	0	1	4	0	1	1	0	0	0	1	0	0	0	0	8
9:00 AM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
10:00 AM	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
11:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	0	2	0	0	0	0	0	0	0	0	0	0	0	2
1:00 PM	0	2	3	0	1	0	0	0	0	0	0	0	0	0	6
2:00 PM	0	0	2	0	0	2	0	0	0	0	0	0	0	0	4
3:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
4:00 PM	0	4	3	0	0	0	0	0	0	0	0	0	0	0	7
5:00 PM	0	2	4	0	1	0	0	0	0	0	0	0	0	0	7
6:00 PM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
7:00 PM	0	3	2	0	0	0	0	0	0	0	0	0	0	0	5
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>16</b>	<b>30</b>	<b>0</b>	<b>5</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>56</b>
<b>Percent</b>	<b>0.0%</b>	<b>28.6%</b>	<b>53.6%</b>	<b>0.0%</b>	<b>8.9%</b>	<b>7.1%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>1.8%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Tuesday, September 24, 2019  
 Eastbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	3	1	0	1	0	0	0	0	0	0	0	0	0	5
7:00 AM	0	5	8	0	3	0	0	0	0	0	0	0	0	0	16
8:00 AM	0	1	1	0	1	0	0	0	0	0	0	0	0	0	3
9:00 AM	0	0	0	0	2	0	0	0	0	0	0	0	0	0	2
10:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
11:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	2	2	0	1	0	0	0	0	0	0	0	0	0	5
1:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
2:00 PM	0	0	2	0	1	1	0	0	0	0	0	0	0	0	4
3:00 PM	0	0	4	0	1	0	0	0	0	0	0	0	0	0	5
4:00 PM	0	2	3	0	3	0	0	0	0	0	0	0	0	0	8
5:00 PM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	3
6:00 PM	0	0	2	0	1	0	0	0	0	0	0	0	0	0	3
7:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>14</b>	<b>28</b>	<b>0</b>	<b>15</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>58</b>
<b>Percent</b>	<b>0.0%</b>	<b>24.1%</b>	<b>48.3%</b>	<b>0.0%</b>	<b>25.9%</b>	<b>1.7%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Tuesday, September 24, 2019  
 Westbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	2	0	0	0	0	0	0	0	0	0	0	0	2
7:00 AM	0	4	7	0	1	1	0	0	0	0	0	0	0	0	13
8:00 AM	0	2	3	0	1	1	0	0	0	0	0	0	0	0	7
9:00 AM	0	0	1	0	0	1	0	0	0	0	0	0	0	0	2
10:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	0	1	2	0	2	0	0	0	0	0	0	0	0	0	5
1:00 PM	0	0	2	0	1	0	0	0	0	0	0	0	0	0	3
2:00 PM	0	1	4	0	2	0	0	0	0	0	0	0	0	0	7
3:00 PM	0	1	1	0	2	0	0	0	0	0	0	0	0	0	4
4:00 PM	0	4	2	0	0	0	0	0	0	0	0	0	0	0	6
5:00 PM	0	2	3	0	0	0	0	0	0	0	0	0	0	0	5
6:00 PM	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
7:00 PM	0	0	4	0	0	0	0	0	0	0	0	0	0	0	4
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>17</b>	<b>33</b>	<b>0</b>	<b>9</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>62</b>
<b>Percent</b>	<b>0.0%</b>	<b>27.4%</b>	<b>53.2%</b>	<b>0.0%</b>	<b>14.5%</b>	<b>4.8%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Wednesday, September 25, 2019  
 Eastbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	3	3	0	1	0	0	0	0	0	0	0	0	0	7
7:00 AM	0	7	4	0	1	0	0	0	0	0	0	0	0	0	12
8:00 AM	0	1	4	0	1	0	0	0	0	0	0	0	0	0	6
9:00 AM	0	0	0	0	2	0	0	0	0	0	0	0	0	0	2
10:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	1	2	0	1	0	0	0	0	0	0	0	0	0	4
12:00 PM	0	0	1	0	2	0	0	0	0	0	0	0	0	0	3
1:00 PM	0	3	3	0	2	0	0	0	0	0	0	0	0	0	8
2:00 PM	0	2	3	0	0	0	0	0	0	0	0	0	0	0	5
3:00 PM	0	0	1	0	1	0	0	0	0	0	0	0	0	0	2
4:00 PM	0	0	5	0	3	0	0	0	0	0	0	0	0	0	8
5:00 PM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	3
6:00 PM	0	0	2	0	0	0	0	0	0	0	0	0	0	0	2
7:00 PM	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
8:00 PM	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>20</b>	<b>30</b>	<b>0</b>	<b>14</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>64</b>
<b>Percent</b>	<b>0.0%</b>	<b>31.3%</b>	<b>46.9%</b>	<b>0.0%</b>	<b>21.9%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	



ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Wednesday, September 25, 2019  
 Westbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	4	5	0	5	1	0	0	0	0	0	0	0	0	15
8:00 AM	0	2	2	0	0	0	0	0	0	0	0	0	0	0	4
9:00 AM	0	0	1	0	1	1	0	0	0	0	0	0	0	0	3
10:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
11:00 AM	0	1	0	0	1	0	0	0	0	0	0	0	0	0	2
12:00 PM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
1:00 PM	0	2	5	0	3	0	0	0	0	0	0	0	0	0	10
2:00 PM	0	2	2	0	1	0	0	0	0	0	0	0	0	0	5
3:00 PM	0	0	3	0	0	0	0	0	0	0	0	0	0	0	3
4:00 PM	0	5	4	0	0	0	0	0	0	0	0	0	0	0	9
5:00 PM	0	0	2	0	0	0	0	0	0	0	0	0	0	0	2
6:00 PM	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
7:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
8:00 PM	0	3	1	0	0	0	0	0	0	0	0	0	0	0	4
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>22</b>	<b>29</b>	<b>0</b>	<b>11</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>64</b>
<b>Percent</b>	<b>0.0%</b>	<b>34.4%</b>	<b>45.3%</b>	<b>0.0%</b>	<b>17.2%</b>	<b>3.1%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Thursday, September 26, 2019  
 Eastbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	3	2	0	2	0	0	0	0	0	0	0	0	0	7
7:00 AM	0	9	5	0	2	0	0	0	0	0	0	0	0	0	16
8:00 AM	0	0	2	0	0	0	0	0	0	0	0	0	0	0	2
9:00 AM	0	0	2	0	1	0	0	0	0	0	0	0	0	0	3
10:00 AM	0	1	3	0	1	0	0	0	0	0	0	0	0	0	5
11:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	3
1:00 PM	0	3	3	0	4	1	0	0	0	0	0	0	0	0	11
2:00 PM	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
3:00 PM	0	0	1	0	2	0	0	0	0	0	0	0	0	0	3
4:00 PM	0	1	4	0	4	0	0	0	0	0	0	0	0	0	9
5:00 PM	0	1	1	0	1	0	0	0	0	0	0	0	0	0	3
6:00 PM	0	3	2	0	0	0	0	0	0	0	0	0	0	0	5
7:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>23</b>	<b>28</b>	<b>0</b>	<b>18</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>70</b>
<b>Percent</b>	<b>0.0%</b>	<b>32.9%</b>	<b>40.0%</b>	<b>0.0%</b>	<b>25.7%</b>	<b>1.4%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Thursday, September 26, 2019  
 Westbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	3	3	0	3	1	0	0	0	0	0	0	0	2	12
8:00 AM	0	3	2	0	1	0	0	0	0	0	0	0	0	0	6
9:00 AM	0	4	0	0	0	1	0	0	0	0	0	0	0	0	5
10:00 AM	0	3	1	0	1	0	0	0	0	0	0	0	0	0	5
11:00 AM	0	0	1	0	1	0	0	0	0	0	0	0	0	0	2
12:00 PM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
1:00 PM	1	4	0	0	1	1	0	0	0	0	0	0	0	0	7
2:00 PM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
3:00 PM	0	1	3	0	3	0	0	0	0	0	0	0	0	0	7
4:00 PM	0	3	2	0	0	0	0	0	0	0	0	0	0	0	5
5:00 PM	0	5	2	0	1	0	0	0	0	1	0	0	0	0	9
6:00 PM	0	5	0	0	0	0	0	0	0	0	0	0	0	0	5
7:00 PM	0	2	3	0	0	0	0	0	0	0	0	0	0	0	5
8:00 PM	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>37</b>	<b>20</b>	<b>0</b>	<b>11</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>75</b>
<b>Percent</b>	<b>1.3%</b>	<b>49.3%</b>	<b>26.7%</b>	<b>0.0%</b>	<b>14.7%</b>	<b>4.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>1.3%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>2.7%</b>	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Friday, September 27, 2019  
 Eastbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	2	2	0	1	0	0	0	0	0	0	0	0	0	5
7:00 AM	0	10	7	0	2	0	0	0	0	0	0	0	0	0	19
8:00 AM	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
9:00 AM	0	1	0	0	1	0	0	0	0	0	0	0	0	0	2
10:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
1:00 PM	0	0	2	0	1	0	0	0	0	0	0	0	0	0	3
2:00 PM	0	0	1	0	4	0	0	0	0	0	0	0	0	0	5
3:00 PM	0	1	1	0	1	0	0	0	0	0	0	0	0	0	3
4:00 PM	0	1	5	0	3	0	0	0	0	0	0	0	0	0	9
5:00 PM	0	1	1	0	1	0	0	0	0	0	0	0	0	0	3
6:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
7:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>18</b>	<b>21</b>	<b>0</b>	<b>15</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>55</b>
<b>Percent</b>	<b>1.8%</b>	<b>32.7%</b>	<b>38.2%</b>	<b>0.0%</b>	<b>27.3%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Friday, September 27, 2019  
 Westbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	5	7	0	3	1	0	0	0	0	0	0	0	0	16
8:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
9:00 AM	0	3	1	0	1	0	0	0	0	0	0	0	0	0	5
10:00 AM	0	2	2	0	0	1	0	0	0	0	0	0	0	0	5
11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
1:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	1	1	2	0	3	0	0	0	0	0	0	0	0	0	7
3:00 PM	0	0	3	0	0	0	0	0	0	0	0	0	0	0	3
4:00 PM	0	3	3	0	0	0	0	0	0	0	0	0	0	0	6
5:00 PM	0	2	1	0	1	1	0	0	0	0	0	0	0	0	5
6:00 PM	0	3	2	0	0	0	0	0	0	0	0	0	0	0	5
7:00 PM	0	0	1	0	0	1	0	0	0	0	0	0	0	0	2
8:00 PM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>19</b>	<b>23</b>	<b>0</b>	<b>9</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>57</b>
<b>Percent</b>	<b>3.5%</b>	<b>33.3%</b>	<b>40.4%</b>	<b>0.0%</b>	<b>15.8%</b>	<b>7.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	



ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

**Total Study Average  
 Eastbound**

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	2	1	0	1	0	0	0	0	0	0	0	0	0	4
7:00 AM	0	6	5	0	2	0	0	0	0	0	0	0	0	0	13
8:00 AM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	3
9:00 AM	0	0	1	0	1	0	0	0	0	0	0	0	0	0	2
10:00 AM	0	0	1	0	1	0	0	0	0	0	0	0	0	0	2
11:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	1	1	0	1	0	0	0	0	0	0	0	0	0	3
1:00 PM	0	1	2	0	1	0	0	0	0	0	0	0	0	0	4
2:00 PM	0	1	1	0	1	0	0	0	0	0	0	0	0	0	3
3:00 PM	0	0	2	0	1	0	0	0	0	0	0	0	0	0	3
4:00 PM	0	1	4	0	3	0	0	0	0	0	0	0	0	0	8
5:00 PM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
6:00 PM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
7:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>15</b>	<b>23</b>	<b>0</b>	<b>12</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>50</b>
<b>Percent</b>	<b>0.0%</b>	<b>30.0%</b>	<b>46.0%</b>	<b>0.0%</b>	<b>24.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

Note: Average only considered on days with 24-hours of data.

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

**Total Study Average  
 Westbound**

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	3	5	0	2	1	0	0	0	0	0	0	0	0	11
8:00 AM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	3
9:00 AM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
10:00 AM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
1:00 PM	0	2	1	0	1	0	0	0	0	0	0	0	0	0	4
2:00 PM	0	1	2	0	1	0	0	0	0	0	0	0	0	0	4
3:00 PM	0	1	2	0	1	0	0	0	0	0	0	0	0	0	4
4:00 PM	0	3	2	0	0	0	0	0	0	0	0	0	0	0	5
5:00 PM	0	2	2	0	0	0	0	0	0	0	0	0	0	0	4
6:00 PM	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
7:00 PM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	3
8:00 PM	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>20</b>	<b>22</b>	<b>0</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>48</b>
<b>Percent</b>	<b>0.0%</b>	<b>41.7%</b>	<b>45.8%</b>	<b>0.0%</b>	<b>10.4%</b>	<b>2.1%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

Note: Average only considered on days with 24-hours of data.

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

3-Day (Tuesday - Thursday) Average  
 Eastbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	3	2	0	1	0	0	0	0	0	0	0	0	0	6
7:00 AM	0	7	6	0	2	0	0	0	0	0	0	0	0	0	15
8:00 AM	0	1	2	0	1	0	0	0	0	0	0	0	0	0	4
9:00 AM	0	0	1	0	2	0	0	0	0	0	0	0	0	0	3
10:00 AM	0	0	1	0	1	0	0	0	0	0	0	0	0	0	2
11:00 AM	0	0	1	0	1	0	0	0	0	0	0	0	0	0	2
12:00 PM	0	1	2	0	1	0	0	0	0	0	0	0	0	0	4
1:00 PM	0	2	2	0	2	0	0	0	0	0	0	0	0	0	6
2:00 PM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	3
3:00 PM	0	0	2	0	1	0	0	0	0	0	0	0	0	0	3
4:00 PM	0	1	4	0	3	0	0	0	0	0	0	0	0	0	8
5:00 PM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	3
6:00 PM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	3
7:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>18</b>	<b>30</b>	<b>0</b>	<b>15</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>63</b>
<b>Percent</b>	<b>0.0%</b>	<b>28.6%</b>	<b>47.6%</b>	<b>0.0%</b>	<b>23.8%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

3-Day (Tuesday - Thursday) Average  
 Westbound

Time	FHWA Vehicle Classification													Total Volume	
	1	2	3	4	5	6	7	8	9	10	11	12	13		
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
7:00 AM	0	4	5	0	3	1	0	0	0	0	0	0	0	1	14
8:00 AM	0	2	2	0	1	0	0	0	0	0	0	0	0	0	5
9:00 AM	0	1	1	0	0	1	0	0	0	0	0	0	0	0	3
10:00 AM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
11:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	1	1	0	1	0	0	0	0	0	0	0	0	0	3
1:00 PM	0	2	2	0	2	0	0	0	0	0	0	0	0	0	6
2:00 PM	0	1	2	0	1	0	0	0	0	0	0	0	0	0	4
3:00 PM	0	1	2	0	2	0	0	0	0	0	0	0	0	0	5
4:00 PM	0	4	3	0	0	0	0	0	0	0	0	0	0	0	7
5:00 PM	0	2	2	0	0	0	0	0	0	0	0	0	0	0	4
6:00 PM	0	3	1	0	0	0	0	0	0	0	0	0	0	0	4
7:00 PM	0	1	3	0	0	0	0	0	0	0	0	0	0	0	4
8:00 PM	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>25</b>	<b>27</b>	<b>0</b>	<b>11</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>66</b>
<b>Percent</b>	<b>0.0%</b>	<b>37.9%</b>	<b>40.9%</b>	<b>0.0%</b>	<b>16.7%</b>	<b>3.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>1.5%</b>	

## Vehicle Speed Report Summary

**Location:** N Rd, E/O Airport Rd  
**Count Direction:** Eastbound / Westbound  
**Date Range:** 9/21/2019 to 9/27/2019  
**Site Code:** 01

	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
<b>Study Total</b>																		
<b>Eastbound</b>	8	14	64	122	108	30	4	0	0	0	0	0	0	0	0	0	0	350
<b>Percent</b>	2.3%	4.0%	18.3%	34.9%	30.9%	8.6%	1.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100%
<b>Westbound</b>	5	21	51	160	100	23	2	0	0	0	0	0	0	0	0	0	0	362
<b>Percent</b>	1.4%	5.8%	14.1%	44.2%	27.6%	6.4%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100%
<b>Total</b>	13	35	115	282	208	53	6	0	0	0	0	0	0	0	0	0	0	712
<b>Percent</b>	1.8%	4.9%	16.2%	39.6%	29.2%	7.4%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100%

Total Study Percentile Speed Summary			Total Study Speed Statistics		
<b>Eastbound</b>			<b>Eastbound</b>		
50th Percentile (Median)	23.5	mph	Mean (Average) Speed	23.4	mph
85th Percentile	29.0	mph	10 mph Pace	18.5 - 28.5	mph
95th Percentile	31.7	mph	Percent in Pace	67.1	%
<b>Westbound</b>			<b>Westbound</b>		
50th Percentile (Median)	23.5	mph	Mean (Average) Speed	23.1	mph
85th Percentile	28.2	mph	10 mph Pace	19.7 - 29.7	mph
95th Percentile	31.1	mph	Percent in Pace	72.9	%



ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Saturday, September 21, 2019  
 Eastbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	1	0	0	2	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	1	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 AM	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 AM	0	0	0	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	0	0	1	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 PM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 PM	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 PM	0	0	2	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 PM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 PM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>12</b>	<b>13</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Percent</b>	<b>0.0%</b>	<b>0.0%</b>	<b>17.6%</b>	<b>35.3%</b>	<b>38.2%</b>	<b>0.0%</b>	<b>8.8%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	23.4 mph	Mean (Average) Speed	24.7 mph
85th Percentile	29.1 mph	10 mph Pace	18.5 - 28.5 mph
95th Percentile	37.3 mph	Percent in Pace	76.5 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Saturday, September 21, 2019  
 Westbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
7:00 AM	0	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	3
8:00 AM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
9:00 AM	0	0	0	2	0	0	1	0	0	0	0	0	0	0	0	0	0	3
10:00 AM	0	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	3
11:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	0	0	2	1	0	0	0	0	0	0	0	0	0	0	0	0	3
1:00 PM	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
2:00 PM	0	2	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	3
3:00 PM	0	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	3
4:00 PM	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	3
5:00 PM	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2
6:00 PM	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	2
7:00 PM	0	0	1	2	1	0	0	0	0	0	0	0	0	0	0	0	0	4
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>3</b>	<b>5</b>	<b>14</b>	<b>9</b>	<b>3</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>35</b>
<b>Percent</b>	<b>0.0%</b>	<b>8.6%</b>	<b>14.3%</b>	<b>40.0%</b>	<b>25.7%</b>	<b>8.6%</b>	<b>2.9%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	23.9 mph	Mean (Average) Speed	23.6 mph
85th Percentile	28.7 mph	10 mph Pace	18.7 - 28.7 mph
95th Percentile	34.0 mph	Percent in Pace	71.43 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Sunday, September 22, 2019  
 Eastbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
8:00 AM	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2
9:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
1:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	0	0	1	0	2	0	0	0	0	0	0	0	0	0	0	0	0	3
3:00 PM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
4:00 PM	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2
5:00 PM	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
6:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>1</b>	<b>5</b>	<b>3</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>13</b>
<b>Percent</b>	<b>0.0%</b>	<b>7.7%</b>	<b>38.5%</b>	<b>23.1%</b>	<b>30.8%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	21.6 mph	Mean (Average) Speed	21.1 mph
85th Percentile	27.0 mph	10 mph Pace	17.7 - 27.7 mph
95th Percentile	27.5 mph	Percent in Pace	84.6 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Sunday, September 22, 2019  
 Westbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
8:00 AM	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	2
9:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
3:00 PM	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2
4:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
5:00 PM	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
6:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 PM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>2</b>	<b>6</b>	<b>4</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>13</b>
<b>Percent</b>	<b>0.0%</b>	<b>15.4%</b>	<b>46.2%</b>	<b>30.8%</b>	<b>7.7%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	18.6 mph	Mean (Average) Speed	18.8 mph
85th Percentile	23.4 mph	10 mph Pace	11.1 - 21.1 mph
95th Percentile	29.6 mph	Percent in Pace	76.92 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Monday, September 23, 2019  
 Eastbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	1	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	1	4	8	2	0	0	0	0	0	0	0	0	0	0	0	0
8:00 AM	0	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0
9:00 AM	0	1	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	0	0	1	1	3	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 PM	0	0	2	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 PM	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 PM	0	1	1	1	2	2	0	0	0	0	0	0	0	0	0	0	0	0
5:00 PM	0	0	2	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 PM	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 PM	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>3</b>	<b>2</b>	<b>8</b>	<b>17</b>	<b>21</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Percent</b>	<b>5.4%</b>	<b>3.6%</b>	<b>14.3%</b>	<b>30.4%</b>	<b>37.5%</b>	<b>8.9%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	24.7 mph	Mean (Average) Speed	23.7 mph
85th Percentile	29.0 mph	10 mph Pace	19.5 - 29.5 mph
95th Percentile	31.7 mph	Percent in Pace	67.9 %



ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Monday, September 23, 2019  
 Westbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	0	5	3	2	0	0	0	0	0	0	0	0	0	0	0	10
8:00 AM	0	0	1	4	3	0	0	0	0	0	0	0	0	0	0	0	0	8
9:00 AM	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
10:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
11:00 AM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
12:00 PM	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2
1:00 PM	0	0	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	6
2:00 PM	0	0	1	2	0	1	0	0	0	0	0	0	0	0	0	0	0	4
3:00 PM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
4:00 PM	0	0	0	3	4	0	0	0	0	0	0	0	0	0	0	0	0	7
5:00 PM	0	0	0	4	2	1	0	0	0	0	0	0	0	0	0	0	0	7
6:00 PM	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2
7:00 PM	1	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>3</b>	<b>7</b>	<b>27</b>	<b>13</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>56</b>
<b>Percent</b>	<b>3.6%</b>	<b>5.4%</b>	<b>12.5%</b>	<b>48.2%</b>	<b>23.2%</b>	<b>7.1%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	22.7 mph	Mean (Average) Speed	22.6 mph
85th Percentile	27.6 mph	10 mph Pace	17.6 - 27.6 mph
95th Percentile	31.4 mph	Percent in Pace	73.21 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Tuesday, September 24, 2019  
 Eastbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	1	0	2	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	3	7	4	2	0	0	0	0	0	0	0	0	0	0	0	0
8:00 AM	0	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0
9:00 AM	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	0	0	0	3	2	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 PM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	0	0	0	1	3	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 PM	0	1	0	1	3	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 PM	0	1	0	3	3	1	0	0	0	0	0	0	0	0	0	0	0	0
5:00 PM	0	0	2	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 PM	0	0	0	2	0	1	0	0	0	0	0	0	0	0	0	0	0	0
7:00 PM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>2</b>	<b>8</b>	<b>22</b>	<b>19</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Percent</b>	<b>1.7%</b>	<b>3.4%</b>	<b>13.8%</b>	<b>37.9%</b>	<b>32.8%</b>	<b>10.3%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	24.1 mph	Mean (Average) Speed	24.0 mph
85th Percentile	29.7 mph	10 mph Pace	17.8 - 27.8 mph
95th Percentile	31.4 mph	Percent in Pace	74.1 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Tuesday, September 24, 2019  
 Westbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	0	7	5	1	0	0	0	0	0	0	0	0	0	0	0	0
8:00 AM	0	0	1	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 AM	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	0	0	1	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 PM	0	0	2	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	0	0	0	2	4	1	0	0	0	0	0	0	0	0	0	0	0	0
3:00 PM	0	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0
4:00 PM	0	0	0	1	3	2	0	0	0	0	0	0	0	0	0	0	0	0
5:00 PM	0	0	0	3	2	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 PM	0	0	0	0	2	1	0	0	0	0	0	0	0	0	0	0	0	0
7:00 PM	0	0	2	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>1</b>	<b>7</b>	<b>22</b>	<b>25</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Percent</b>	<b>0.0%</b>	<b>1.6%</b>	<b>11.3%</b>	<b>35.5%</b>	<b>40.3%</b>	<b>11.3%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	25.1 mph	Mean (Average) Speed	25.1 mph
85th Percentile	29.4 mph	10 mph Pace	20.5 - 30.5 mph
95th Percentile	31.4 mph	Percent in Pace	77.42 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Wednesday, September 25, 2019  
 Eastbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	1	4	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	2	4	5	1	0	0	0	0	0	0	0	0	0	0	0	0
8:00 AM	0	2	1	2	1	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 AM	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	1	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	0	0	2	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 PM	0	1	0	3	3	1	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	2	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 PM	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 PM	0	0	1	4	0	3	0	0	0	0	0	0	0	0	0	0	0	0
5:00 PM	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 PM	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 PM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>4</b>	<b>5</b>	<b>13</b>	<b>20</b>	<b>16</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Percent</b>	<b>6.3%</b>	<b>7.8%</b>	<b>20.3%</b>	<b>31.3%</b>	<b>25.0%</b>	<b>9.4%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	22.6 mph	Mean (Average) Speed	21.9 mph
85th Percentile	27.8 mph	10 mph Pace	18.7 - 28.7 mph
95th Percentile	33.3 mph	Percent in Pace	65.6 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Wednesday, September 25, 2019  
 Westbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	1	10	4	0	0	0	0	0	0	0	0	0	0	0	0	15
8:00 AM	0	0	1	3	0	0	0	0	0	0	0	0	0	0	0	0	0	4
9:00 AM	0	0	2	0	1	0	0	0	0	0	0	0	0	0	0	0	0	3
10:00 AM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
11:00 AM	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2
12:00 PM	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	2
1:00 PM	0	1	0	7	2	0	0	0	0	0	0	0	0	0	0	0	0	10
2:00 PM	0	3	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	5
3:00 PM	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	3
4:00 PM	0	0	0	3	5	1	0	0	0	0	0	0	0	0	0	0	0	9
5:00 PM	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2
6:00 PM	0	0	1	0	1	1	0	0	0	0	0	0	0	0	0	0	0	3
7:00 PM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
8:00 PM	0	2	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	4
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>7</b>	<b>7</b>	<b>32</b>	<b>15</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>64</b>
<b>Percent</b>	<b>1.6%</b>	<b>10.9%</b>	<b>10.9%</b>	<b>50.0%</b>	<b>23.4%</b>	<b>3.1%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	23.5 mph	Mean (Average) Speed	22.2 mph
85th Percentile	27.0 mph	10 mph Pace	18.9 - 28.9 mph
95th Percentile	29.5 mph	Percent in Pace	76.56 %



ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Thursday, September 26, 2019  
 Eastbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	1	2	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	0	8	5	3	0	0	0	0	0	0	0	0	0	0	0	0
8:00 AM	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 AM	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 AM	0	0	0	1	3	1	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 PM	0	1	5	4	1	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 PM	0	0	1	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0
4:00 PM	0	0	2	2	3	2	0	0	0	0	0	0	0	0	0	0	0	0
5:00 PM	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 PM	0	0	0	1	4	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 PM	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>2</b>	<b>11</b>	<b>29</b>	<b>21</b>	<b>6</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Percent</b>	<b>0.0%</b>	<b>2.9%</b>	<b>15.7%</b>	<b>41.4%</b>	<b>30.0%</b>	<b>8.6%</b>	<b>1.4%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	23.3 mph	Mean (Average) Speed	23.8 mph
85th Percentile	29.3 mph	10 mph Pace	20.0 - 30.0 mph
95th Percentile	31.2 mph	Percent in Pace	71.4 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Thursday, September 26, 2019  
 Westbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	2	4	6	0	0	0	0	0	0	0	0	0	0	0	0	12
8:00 AM	0	0	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	6
9:00 AM	0	0	1	4	0	0	0	0	0	0	0	0	0	0	0	0	0	5
10:00 AM	0	0	0	1	2	2	0	0	0	0	0	0	0	0	0	0	0	5
11:00 AM	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2
12:00 PM	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2
1:00 PM	1	0	0	5	1	0	0	0	0	0	0	0	0	0	0	0	0	7
2:00 PM	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	2
3:00 PM	0	0	1	2	4	0	0	0	0	0	0	0	0	0	0	0	0	7
4:00 PM	0	0	0	1	4	0	0	0	0	0	0	0	0	0	0	0	0	5
5:00 PM	0	1	6	2	0	0	0	0	0	0	0	0	0	0	0	0	0	9
6:00 PM	0	0	0	2	3	0	0	0	0	0	0	0	0	0	0	0	0	5
7:00 PM	0	0	2	1	2	0	0	0	0	0	0	0	0	0	0	0	0	5
8:00 PM	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	3
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>2</b>	<b>13</b>	<b>31</b>	<b>24</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>75</b>
<b>Percent</b>	<b>2.7%</b>	<b>2.7%</b>	<b>17.3%</b>	<b>41.3%</b>	<b>32.0%</b>	<b>4.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	23.2 mph	Mean (Average) Speed	22.8 mph
85th Percentile	27.4 mph	10 mph Pace	19.0 - 29.0 mph
95th Percentile	29.8 mph	Percent in Pace	80 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Friday, September 27, 2019  
 Eastbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	1	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	3	7	6	3	0	0	0	0	0	0	0	0	0	0	0	0
8:00 AM	0	0	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0
9:00 AM	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 PM	0	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	0	0	1	1	2	1	0	0	0	0	0	0	0	0	0	0	0	0
3:00 PM	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 PM	0	0	2	2	4	1	0	0	0	0	0	0	0	0	0	0	0	0
5:00 PM	0	0	0	2	0	1	0	0	0	0	0	0	0	0	0	0	0	0
6:00 PM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>2</b>	<b>13</b>	<b>19</b>	<b>14</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Percent</b>	<b>0.0%</b>	<b>3.6%</b>	<b>23.6%</b>	<b>34.5%</b>	<b>25.5%</b>	<b>12.7%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	22.9 mph	Mean (Average) Speed	23.5 mph
85th Percentile	29.3 mph	10 mph Pace	16.2 - 26.2 mph
95th Percentile	32.8 mph	Percent in Pace	67.3 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

Friday, September 27, 2019  
 Westbound

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	0	10	5	1	0	0	0	0	0	0	0	0	0	0	0	16
8:00 AM	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
9:00 AM	0	0	0	3	2	0	0	0	0	0	0	0	0	0	0	0	0	5
10:00 AM	0	0	1	3	1	0	0	0	0	0	0	0	0	0	0	0	0	5
11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
1:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	0	0	2	2	3	0	0	0	0	0	0	0	0	0	0	0	0	7
3:00 PM	0	1	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	3
4:00 PM	0	0	0	3	1	1	1	0	0	0	0	0	0	0	0	0	0	6
5:00 PM	0	0	1	2	1	1	0	0	0	0	0	0	0	0	0	0	0	5
6:00 PM	0	0	1	3	0	1	0	0	0	0	0	0	0	0	0	0	0	5
7:00 PM	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	2
8:00 PM	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>3</b>	<b>6</b>	<b>30</b>	<b>13</b>	<b>4</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>57</b>
<b>Percent</b>	<b>0.0%</b>	<b>5.3%</b>	<b>10.5%</b>	<b>52.6%</b>	<b>22.8%</b>	<b>7.0%</b>	<b>1.8%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Daily Percentile Speed Summary		Speed Statistics	
50th Percentile (Median)	23.6 mph	Mean (Average) Speed	23.6 mph
85th Percentile	28.4 mph	10 mph Pace	19.7 - 29.7 mph
95th Percentile	33.7 mph	Percent in Pace	77.19 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

**Total Study Average  
 Eastbound**

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	1	5	4	2	0	0	0	0	0	0	0	0	0	0	0	0
8:00 AM	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 AM	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 AM	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 PM	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 PM	0	0	0	2	1	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 PM	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 PM	0	0	1	2	2	1	0	0	0	0	0	0	0	0	0	0	0	0
5:00 PM	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 PM	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>17</b>	<b>15</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Percent</b>	<b>0.0%</b>	<b>0.0%</b>	<b>16.7%</b>	<b>40.5%</b>	<b>35.7%</b>	<b>7.1%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Note: Average only considered on days with 24-hours of data.

Total Study Percentile Speed Summary		Total Study Speed Statistics	
50th Percentile (Median)	23.5 mph	Mean (Average) Speed	23.4 mph
85th Percentile	29.0 mph	10 mph Pace	18.5 - 28.5 mph
95th Percentile	31.7 mph	Percent in Pace	67.1 %



ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 to 9/27/2019  
 Site Code: 01

**Total Study Average  
 Westbound**

Time	Speed Range (mph)																	Total Volume
	0 - 10	10 - 15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 - 50	50 - 55	55 - 60	60 - 65	65 - 70	70 - 75	75 - 80	80 - 85	85 +	
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:00 AM	0	0	0	5	4	1	0	0	0	0	0	0	0	0	0	0	0	10
8:00 AM	0	0	1	3	1	0	0	0	0	0	0	0	0	0	0	0	0	5
9:00 AM	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	3
10:00 AM	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2
11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:00 PM	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2
1:00 PM	0	0	1	3	0	0	0	0	0	0	0	0	0	0	0	0	0	4
2:00 PM	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	4
3:00 PM	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2
4:00 PM	0	0	0	2	3	1	0	0	0	0	0	0	0	0	0	0	0	6
5:00 PM	0	0	2	2	1	0	0	0	0	0	0	0	0	0	0	0	0	5
6:00 PM	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2
7:00 PM	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	3
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>1</b>	<b>7</b>	<b>22</b>	<b>16</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>48</b>
<b>Percent</b>	<b>0.0%</b>	<b>2.1%</b>	<b>14.6%</b>	<b>45.8%</b>	<b>33.3%</b>	<b>4.2%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Note: Average only considered on days with 24-hours of data.

Total Study Percentile Speed Summary		Total Study Speed Statistics	
50th Percentile (Median)	23.5 mph	Mean (Average) Speed	23.1 mph
85th Percentile	28.2 mph	10 mph Pace	19.7 - 29.7 mph
95th Percentile	31.1 mph	Percent in Pace	72.9 %

ATTACHMENT 3



Location: N Rd, E/O Airport Rd  
 Date Range: 9/21/2019 - 9/27/2019  
 Site Code: 01

Time	Saturday			Sunday			Monday			Tuesday			Wednesday			Thursday			Friday			Mid-Week Average				
	9/21/2019			9/22/2019			9/23/2019			9/24/2019			9/25/2019			9/26/2019			9/27/2019							
	EB	WB	Total	EB	WB	Total	EB	WB	Total	EB	WB	Total	EB	WB	Total	EB	WB	Total	EB	WB	Total	EB	WB	Total	EB	WB
12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
2:00 AM	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
5:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
6:00 AM	3	1	4	0	0	0	4	0	4	5	2	7	7	0	7	7	0	7	5	0	5	6	1	7		
7:00 AM	5	3	8	1	1	2	15	10	25	16	13	29	12	15	27	16	12	28	19	16	35	15	13	28		
8:00 AM	3	1	4	2	2	4	4	8	12	3	7	10	6	4	10	2	6	8	3	1	4	4	6	9		
9:00 AM	1	3	4	0	0	0	3	2	5	2	2	4	2	3	5	3	5	8	2	5	7	2	3	6		
10:00 AM	4	3	7	0	0	0	0	1	1	1	1	2	0	1	1	5	5	10	1	5	6	2	2	4		
11:00 AM	1	1	2	1	1	2	1	1	2	1	0	1	4	2	6	1	2	3	0	0	0	2	1	3		
12:00 PM	3	3	6	1	0	1	5	2	7	5	5	10	3	2	5	3	2	5	1	1	2	4	3	7		
1:00 PM	1	3	4	0	0	0	3	6	9	1	3	4	8	10	18	11	7	18	3	0	3	7	7	13		
2:00 PM	4	3	7	3	3	6	2	4	6	4	7	11	5	5	10	1	2	3	5	7	12	3	5	8		
3:00 PM	2	3	5	1	2	3	3	1	4	5	4	9	2	3	5	3	7	10	3	3	6	3	5	8		
4:00 PM	5	3	8	2	1	3	7	7	14	8	6	14	8	9	17	9	5	14	9	6	15	8	7	15		
5:00 PM	1	2	3	2	2	4	5	7	12	3	5	8	3	2	5	3	9	12	3	5	8	3	5	8		
6:00 PM	1	2	3	0	0	0	2	2	4	3	3	6	2	3	5	5	5	10	1	5	6	3	4	7		
7:00 PM	0	4	4	0	1	1	1	5	6	1	4	5	1	1	2	1	5	6	0	2	2	1	3	4		
8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	1	4	5	0	3	3	0	1	1	0	2	3		
9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Total	34	35	69	13	13	26	56	56	112	58	62	120	64	64	128	70	75	145	55	57	112	64	67	131		
Percent	49%	51%	-	50%	50%	-	50%	50%	-	48%	52%	-	50%	50%	-	48%	52%	-	49%	51%	-	49%	51%	-		
AM Peak	07:00	07:00	07:00	08:00	08:00	08:00	07:00	07:00	07:00	07:00	07:00	07:00	07:00	07:00	07:00	07:00	07:00	07:00	07:00	07:00	07:00	07:00	07:00	07:00		
Vol.	5	3	8	2	2	4	15	10	25	16	13	29	12	15	27	16	12	28	19	16	35	15	13	28		
PM Peak	16:00	19:00	16:00	14:00	14:00	14:00	16:00	16:00	16:00	16:00	14:00	16:00	13:00	13:00	13:00	13:00	17:00	13:00	16:00	14:00	16:00	16:00	13:00	16:00		
Vol.	5	4	8	3	3	6	7	7	14	8	7	14	8	10	18	11	9	18	9	7	15	8	7	15		

1. Mid-week average includes data between Tuesday and Thursday.

<b>Location:</b>							
Vehicle	Off-Site to Lot	Lot to Office	Lot to Off-Site	Off-Site to Office	Office to Lot	Office to Off-Site	Notes
Auto			11:03:08				Stopped near the lot
Tow Truck			11:21:15				Stopped near the lot
Auto			11:23:33				Stopped near the lot
Auto			11:25:09				
Tow Truck			13:19:38				Stopped near the lot
Tow Truck			15:07:26				Stopped near the lot
Tow Truck			17:34:52				Stopped near the lot
Auto					16:55:02		Stopped near the lot
Tow Truck				8:21:09		10:11:47	Stopped near the Office
Tow Truck				10:27:30		11:51:46	Stopped near the Office
Tow Tuck				10:30:35		12:04:00	Stopped near the Office
Auto				10:37:19	10:49:41		Stopped near the Office
Auto				10:53:58		11:07:18	Stopped near the Office
Auto						10:57:50	
Auto				10:57:42	11:16:31		Stopped near the Office
Tow Tuck				11:08:43		11:20:33	Stopped near the Office
Tow Tuck				12:19:54	13:18:07		Stopped near the Office
Auto				12:27:46		12:37:31	
Auto				12:28:06		12:37:42	
Tow Truck				12:57:51		12:55:14	Stopped near the Office & Office to Off-Site Entry time, Exit time Off-Site to Office
Auto				12:56:12		13:02:14	Stopped near the Office
Tow Truck				14:11:14		15:20:08	
Tow Truck				14:23:16	14:33:48		Stopped near the Office
Tow Truck				14:30:58		15:56:16	Stopped near the Office
Auto				15:29:58		15:36:27	Stopped near the Office
Tow Truck				16:26:02	16:54:12		Stopped near the Office
Tow Truck				16:26:05		17:14:55	Stopped near the Office
Auto				16:36:43	16:55:08		Stopped near the Office
Auto				16:38:07		17:14:59	Stopped near the Office

ATTACHMENT 3

19445 - Monterey  
 Tow Yard - Vehicle Movements  
 IDAX Data Solutions  
 Wed, September 25, 2019

<b>Location:</b>							
Vehicle	Off-Site to Lot	Lot to Office	Lot to Off-Site	Off-Site to Office	Office to Lot	Office to Off-Site	Notes
Tow Truck			11:53:54				Stopped near the lot
Tow Truck			12:03:03				Stopped near the lot
Tow Truck	13:57:35						Stopped near the lot
Tow Truck	15:47:49						Stopped near the lot
Tow Truck				8:26:48		9:07:06	Stopped near the Office
Auto				9:45:14		9:47:17	Stopped near the Office
Auto				9:50:14		9:56:11	Stopped near the Office
Tow Truck				9:55:40		10:15:14	Stopped near the Office
Tow Truck				10:46:00	11:44:15		Stopped near the Office
Auto				11:10:34		11:29:39	Stopped near the Office
Tow Truck				11:11:19	11:16:13		Stopped near the Office
Auto				11:23:18		11:44:14	
Tow Truck		11:31:03				12:52:17	Stopped near the Office
Tow Truck				11:32:59	11:44:10		Stopped near the Office
Auto				12:49:31		12:51:05	
Tow Truck				14:06:42		14:39:46	Stopped near the Office
Tow Truck				15:08:21		17:08:59	Stopped near the Office
Tow Truck				15:51:56		17:00:44	Stopped near the Office