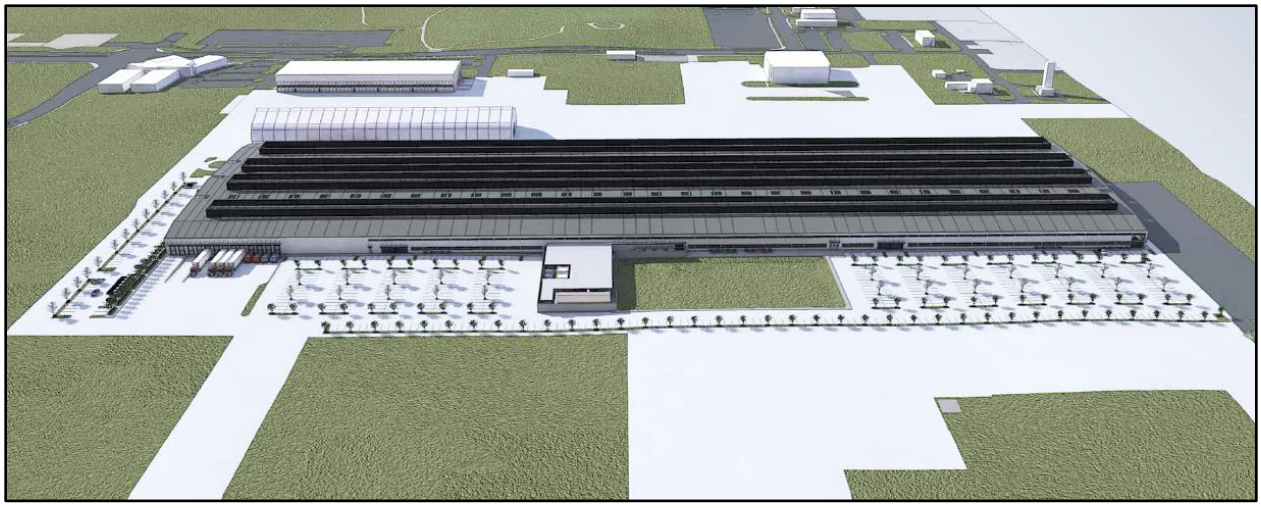
SCREENCHECK DRAFT
INITIAL STUDY

Joby Aviation Manufacturing Facility

File No. DR 2019-27



January 2020

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Acronyms

AB	Assembly Bill
AFY	acre feet per year
Airport	Marina Municipal Airport
Airport Master Plan	Final Marina Municipal Airport Master Plan
ALUCP	Marina Municipal Airport Land Use Compatibility Plan
AMBAG	Association of Monterey Bay Governments
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ARB	California Air Resources Board
Army	United States Department of the Army
ATC	Authority to Construct
BAAQMD	Bay Area Air Quality Management District
BMPs	Best Management Practices
BO	Biological Opinion
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalGreen Code	California Green Building Standards Code
Cal-IPC	California Invasive Plant Council
Cal-OSHA	California Division of Occupational Health and Safety
CDFA	California Department of Food and Agriculture
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFCs	chlorofluorocarbons
CH_4	methane
City	City of Marina
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	County of Monterey
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CRHR	California Register of Historic Resources
CRPR	California Rare Plant Rank
CSC	California Species of Concern
CSTDM	Caltrans Statewide Travel Demand Model
CY	cubic yards
dB	decibel
dBA	A-weighted decibel
DD&A	Denise Duffy & Associates, Inc.
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EA	Environmental Assessment
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EPA	United States Environmental Protection Agency
ESA	Endangered Species Act

FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FORA	Fort Ord Reuse Authority
Fort Ord BRAC	Fort Ord Base Reuse and Cleanup
Fort Ord HCP	Fort Ord Multi-Species Habitat Conservation Plan
Fort Ord HMP	Installation-Wide Multispecies Habitat Management Plan for Former Fort Ord
FOST	Finding of Suitability to Transfer
FT	Federally threatened
ft^2	square feet
Geotech Report	Geotechnical Investigation Report
GHG	greenhouse gas
HRA	Health Risk Assessment
IS	Initial Study
ITE	Institute of Transportation Engineers
Joby	Joby Aero, Inc.
kBtu	kilo-British thermal units
kWh	kilowatt hours
Leq	24-hour average noise level of all hourly continuous sound
LOS	level of service
M1W	Monterey One Water
MBARD	Monterey Bay Air Resource District
MBCP	Monterey Bay Community Power
MCWD	Marina Coast Water District
MEC	munitions and explosives of concern
MFD	Marina Fire Department
MND	Mitigated Negative Declaration
MPD	Marina Police Department
MRWMD	Monterey Regional Waste Management District
MT/yr	metric tons per year
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCAB	North Central Coast Air Basin
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NPIAS	National Plan of Integrated Airport Systems
NPL	Federal National Priority List (also known as Superfund)
NWIC	Northwest Information Center
O_3	ozone
OPR	Office of Planning and Research
Pb	lead
PG&E	Pacific Gas & Electric Company
$PM_{2.5}$	fine particulate matter
PM_{10}	particulate matter
PRC	Public Resources Code
PUC	Public Utilities Code
Reuse Plan	Fort Ord Reuse Plan
ROG	reactive organic gases

RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAA	California State Aeronautics Act
SB	Senate Bill
SEIS	Supplemental Environmental Impact Statement
SLF	sacred lands file
SLOAPCD	San Luis Obispo Air Pollution Control District
SO_2	sulfur dioxide
SVGB	Salinas Valley Groundwater Basin
SWCA	SWCA Environmental Consultants
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
TAMC	Transportation Agency for Monterey County
TAZ	transportation analysis zones
TCE	trichloroethylene
TDM	Travel demand management
UC MBEST	University of California Monterey Bay Education, Science and Technology
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
VMT	vehicle miles traveled
VOC	volatile organic compound
VTOL	vertical take-off and landing
WL	California Department of Fish and Wildlife Watch List

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I. BACKGROUND INFORMATION

Project Title:	Joby Aviation Manufacturing Facility
File No.:	DR 2019-27
Project Location:	Marina Municipal Airport in Marina, California
Name of Property Owner:	City of Marina
Name of Applicant:	Joby Aero, Inc.
Assessor's Parcel Number(s):	031-111-037-000
Acreage of Property:	25.7 ac
General Plan Designation:	Industrial/Service Commercial
Zoning District:	A-1: Airport Districts, Aviation-Related Zone

Lead Agency:	City of Marina
Prepared By:	Denise Duffy & Associates, Inc.
Date Prepared:	January 10, 2020
Contact Person:	Christy Hopper, Planning Services Manager
Phone Number:	(831) 884-1238

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II. DESCRIPTION OF PROJECT AND ENVIRONMENTAL SETTING

A. INTRODUCTION

The Joby Aero, Inc. (Joby) Aviation Manufacturing Facility Project ("project") consists of the construction of a new 580,000 square foot (ft^2) single story steel manufacturing building which would be used for the production of light-weight, all-electric, vertical take-off and landing (VTOL) aircrafts. The building would be located at the Marina Municipal Airport (Marina Airport or Airport) within the City of Marina, California (**Figure 1**). The overall building would consist of approximately 580,000 ft^2; however, it is anticipated to be constructed in two phases, of approximately 290,000 ft^2 per phase, with the second phase being completed approximately three to five years after the first phase is operational (**Figure 2**). This document analyzes the potential environmental impacts that could result from full build out of the 580,000 ft^2 building.

The project site is within the Marina Airport, for which the City of Marina (City) has approved the Final Marina Municipal Airport Master Plan (Airport Master Plan; City, 2018a). The Airport Master Plan Final Initial Study (IS)/Mitigated Negative Declaration (MND) was adopted and the Airport Master Plan was approved by the Marina City Council on June 5, 2018 (City, 2018b). The Master Plan provides a framework to guide possible future airport development over the next 20 years in a cost-effective manner that both supports projected aviation demand and considers environmental and socioeconomic issues.

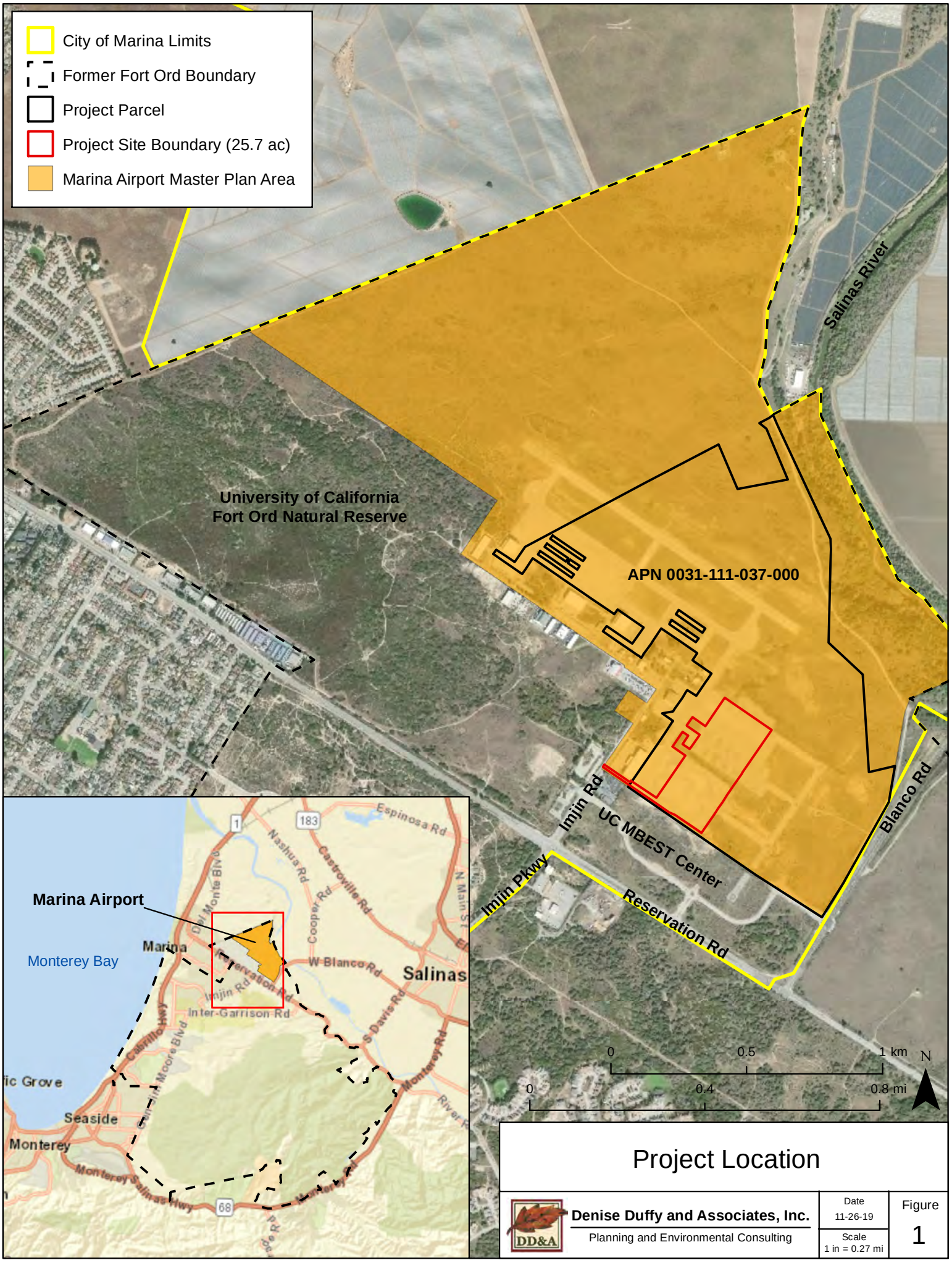
This IS has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA). The purpose of an IS is to determine whether the project would pose significant unavoidable impacts to the surrounding environment. Based on the following analysis, the potential environmental impacts of the project would have less-than-significant impacts with implementation of Mitigation Measures.

B. PROJECT LOCATION

The Airport is located within the City limits of Marina, in Monterey County, California (**Figure 1**). The Airport is an ideal location to mass produce VTOLs, as it offers sufficient acreage and close proximity to Joby headquarters in Santa Cruz, California. Since 2018, Joby has engaged with the City to acquire a land lease and approvals to build facilities at the Marina Airport. The City and Joby considered several locations within the Airport prior to choosing the project site.

The project is located within Assessor's Parcel Number (APN) 031-111-037-000 (**Figure 1**). The project would be constructed on approximately 25.7 acres within the eastern portion of the Airport on a relatively flat area that consists of approximately 23.2 acres of two to 10 inch-thick concrete tarmac (Soil Surveys Group, Inc., 2019), and approximately 2.5 acres of disturbed ruderal and white-tip clover swale vegetation. The approximate elevation of the project site is 140 feet above mean sea level.

The site is bounded to the west by airport hangars, aircraft parking aprons and taxiways, office space, a fire station, parking lots, Imjin Road, and open space/habitat preserve; to the south by open space that is planned to be developed as the central north campus of the University of California Monterey Bay Education, Science and Technology (UC MBEST) Center and Reservation Road; to the north by runways, taxiways aircraft parking aprons, and open space/habitat preserve; and to the east by an additional aircraft parking apron and taxiways, open space that is planned for development as the Airport Business Park, and Blanco Road (**Figure 1)**.



Project Location

Denise Duffy and Associates, Inc. Planning and Environmental Consulting		Date 11-26-19	Figure 1
		Scale 1 in = 0.27 mi	

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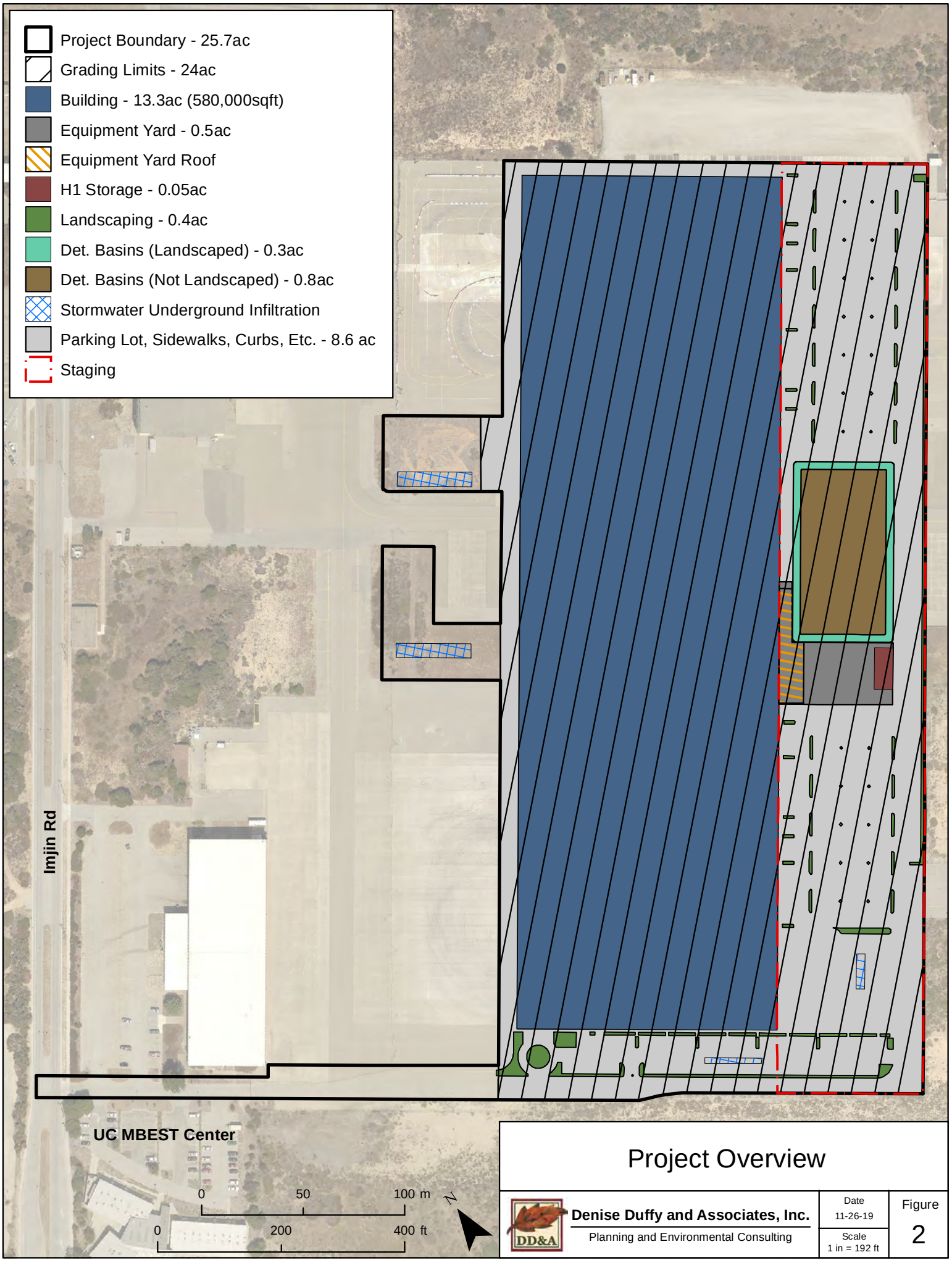

Project Overview

Denise Duffy and Associates, Inc.
Planning and Environmental Consulting

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Figure: 2

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The project site is located within the boundaries of the approved Airport Master Plan (**Figure 1**). The Airport Master Plan planning area is bordered to the north by the Salinas River, agricultural uses, a landfill, and a waste water treatment facility; to the west by open space followed by residential uses; to the south by commercial uses on the north side of Reservation Road and residential uses on the south side of Reservation Road; and to the east by agricultural lands. The Airport Master Plan area consists of approximately 845 acres, including 203 acres of revenue-producing purposes, 175 acres of habitat preserve, 52 acres of non-aviation revenue producing purposes (the Airport Business Park), and 417 acres of aviation-related purposes. The project site is located within the area designated for aviation-related purposes (City, 2018a).

As identified above, the project site would be located on existing aircraft tarmac, identified in the Airport Master Plan as the North, Middle, and South Tarmacs (**Figure 2**). While designated for aviation use, the tarmac areas have not been in demand by aviation users. Since 1995 when the City took over operation of the Airport, the tarmac areas have been utilized for revenue generation through a variety of non-aviation activity, including a go-kart operator organization, an autocross operator, and an academy providing training for public safety professionals.

The tarmac areas are designated for aviation development in the current Marina Municipal Airport Land Use Compatibility Plan (ALUCP) and are considered by the Federal Aviation Administration (FAA) to be "improved" aviation land that must be reserved for aviation uses (County of Monterey Airport Land Use Commission, 2019). The FAA has determined that the continued use of the north and south tarmac areas by non-aviation users must end and that those operations be relocated to off of "improved" Airport land that is reserved for aviation activities. Therefore, development of the project would bring the land use back into compliance with the ALUCP and Airport Master Plan.

C. BACKGROUND

The Airport, formerly known as Fritzsche Army Airfield, was originally constructed and utilized to support the military functions of the former Fort Ord. With the closure of Fort Ord and the relocation of the 7th Infantry Division to Fort Lewis, Washington, the airport was conveyed to the City to be maintained for the use and benefit of the public as an airport as a part of the *Fort Ord Reuse Plan* (Reuse Plan) (Fort Ord Reuse Authority [FORA], 1994).

The Airport is included within approximately 1,391 acres identified by the former Redevelopment Agency of the City of Marina, in 1997, as Project Area 2. The State of California subsequently dissolved all redevelopment agencies in 2012, through adoption of Assembly Bill (AB) 1X 26. The goal of the organization was to facilitate economic recovery and the conversion of former Fort Ord facilities to civilian uses through attraction of employment and private investment, infrastructure improvements, modernization and expansion of the airport, and assistance to the University of California in development of the UC MBEST Center, located south of the Airport. The Airport has continued to be improved with significant development grants from both the federal government and the state, including significant rehabilitation of the runways, taxiways, and terminal area aprons within the last decade (City, 2018a).

The Airport has been in operation as a public use general aviation facility, as defined by the FAA, since 1995 and is included in the FAA's *National Plan of Integrated Airport Systems* (NPIAS). The Airport provides support to commercial, military, and private aircraft. Services and facilities currently available include hangar storage, tie-downs, minor aircraft maintenance, skydiving, and fueling. The airfield layout consists of a single runway, measuring 3,483 feet in length and 75 feet in width and is strength-rated at 20,000 pounds for aircraft with single wheel landing gear configurations and 50,000 pounds for dual wheel landing gear configurations. As of 2013, there are estimated to be 50 based aircraft and 30,000 annual operations. The Airport provides unique economic development opportunities for the community including both aviation and non-aviation uses. Future plans for the facility have long included extending the runway to 5,000+ feet in order to expand the economic development potential (City, 2018a).

Existing Environmental Studies and Plans

During the closure and disposal of the former Fort Ord in the 1990s, several studies and plans were prepared. A Final Environmental Impact Statement (EIS) (1993) and a Final Supplemental EIS (SEIS) (1996) were prepared by the United States Army Corps of Engineers (USACE) to evaluate the environmental consequences of this major federal action and FORA was established. Additional action then took place by FORA as the Reuse Plan was finalized, and a Final Environmental Impact Report (EIR) (which was tiered off of the previous EIS and SEIS) was prepared to evaluate the changes between the Final Reuse Plan and the previous Interim Reuse Plan (FORA, 1997).

In conjunction with these environmental studies, the United States Fish and Wildlife Service (USFWS) issued a Biological Opinion (BO), which required that a Habitat Management Plan be developed and implemented as a mitigation measure for impacts on vegetation and wildlife resources (USFWS, 1993). Consequently, the *Installation-Wide Multispecies Habitat Management Plan for Former Fort Ord* (Fort Ord HMP) was prepared by USACE in 1994, and revised in 1997. The USFWS issued five additional BOs and one amendment between 1999 and 2014 as a result of consultation reinitiated by the United States Department of the Army (Army). On May 28, 2015, USFWS issued a Programmatic BO that superseded the previous BOs. Then on June 7, 2017, USFWS issued a reinitiated Programmatic BO that supersedes the 2015 Programmatic BO. The 2017 Programmatic BO is the current and relevant BO for activities at the former Fort Ord; and contains additional conservation measures and recommendations relating to environmental cleanup actions at former Fort Ord cleanup sites.

Currently, a *Fort Ord Multi-Species Habitat Conservation Plan* (Fort Ord HCP) is being prepared. If approved, the Fort Ord HCP would serve as the basis for issuance of a base-wide Section 2081 (*California Endangered Species Act* [CESA]) incidental take permit by the California Department of Fish and Wildlife (CDFW) and as the basis for issuance of a base-wide Section 10(a)(1)(B) (federal *Endangered Species Act* [ESA]) incidental take permit by the USFWS for species listed in the Fort Ord HCP. The Fort Ord HCP would incorporate all relevant information from the Fort Ord HMP.

Several environmental studies have also been prepared that are specific to the Airport itself. As part of the reuse planning effort, the cities of Seaside and Marina formed the Fort Ord Economic Development Authority. This group, on behalf of the former Fritzsche Army Field, applied for funds from FAA to prepare a two-phased feasibility/airport master planning study for its conversion to civilian general aviation use. An Airport Layout Plan and supporting documents were submitted for FAA approval, an Airport Master Plan was prepared, and a joint Environmental Assessment (EA)/EIR was prepared to evaluate the environmental impacts of the proposed plans (City and FAA, 1995).

The City revised the Airport Master Plan in 2008 and again in 2018 (City, 2018a). The Airport Master Plan provides a framework to guide possible future airport development over the next 20 years in a cost-effective manner that both supports projected aviation demand and considers environmental and socioeconomic issues. The Airport Master Plan does not include land use policies that would guide growth in a manner similar to a specific or general land use plan; rather, the objective of the Airport Master Plan is to coordinate future on-airport land uses in a manner that meets with FAA design standards and is compatible with the airport environs. An IS/MND was also prepared for the Airport Master Plan in 2017/2018 (City, 2018b), and adopted by the City Council in June 2018 that evaluates the environmental impacts of the updated Airport Master Plan.

D. OVERVIEW OF THE PROPOSED PROJECT

The project consists of the construction and operation of a new VTOL aircraft manufacturing building at the Marina Airport. The building may be constructed all at once, or in two phases, with Phase 2 of the project being completed within three to five years after Phase 1 is operational (**Figure 3**). The project site is relatively flat and most development would occur on currently paved areas. Existing paving to be removed would be crushed and used as engineered fill under future pavement. The project also includes offices, shipping and receiving docks, parking, landscaping and irrigation, fencing, utility connections, stormwater ponds, a storage building, (**Figure 3**). Preliminary Project Plans are available in **Appendix A**.

Project Components

Aircraft Manufacturing Building

The main component of the project includes construction of a new 580,000 ft^2 single story steel manufacturing building which would be used for the production of VTOL aircraft (**Figure 3** and Sheet A101 in **Appendix A**). As identified above, the building could be constructed all at once or could be constructed in two phases (290,000 ft^2 per phase). The building would include space for component fabrication, 3D printing, assembly, paint, offices and meeting space, shipping and receiving, a kitchen/cafeteria area, and a lobby/main entry (see Sheet A201 in **Appendix** A). Shipping and receiving docks would be constructed for semi-trucks and bobtail truck deliveries. There would be five loading docks for large trucks, two loading bays for smaller delivery vehicles, and two level loading areas for various types of smaller vehicles. The building would extend to a height of 41 feet for the main roof area and up to 51 feet where screened roof-mounted electrical equipment would be located (see Sheets A401 and A402 in **Appendix A**).

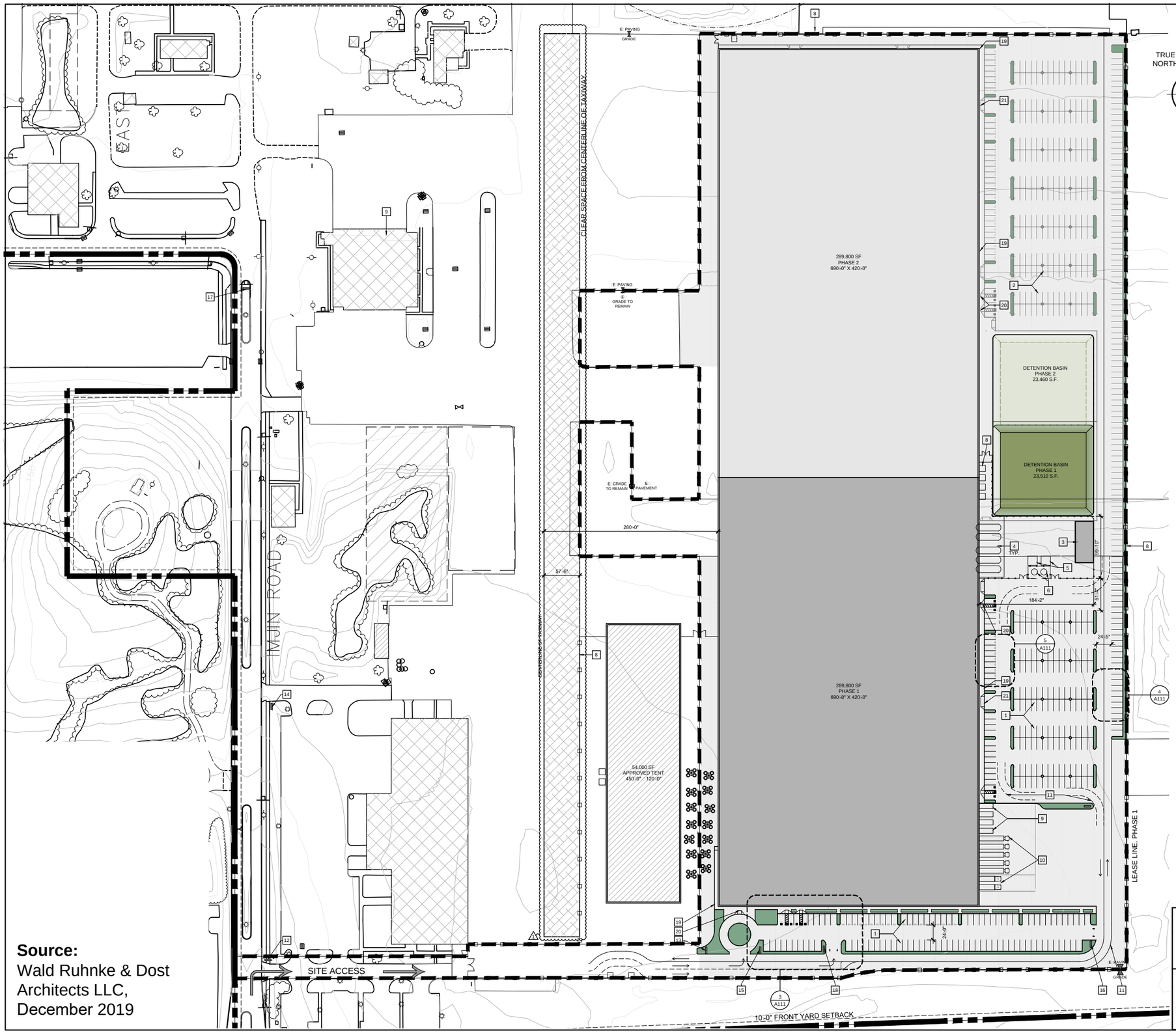
Equipment Yard

The project includes a partially-covered equipment yard that would be surrounded by an approximately 10-ft fence/wall to provide separation from the parking lot (**Figure 3** and Sheet A101 in **Appendix A**). The equipment yard would include two 9,000-gallon inert gas tanks, two 15ft x 15ft cooling towers, five 11ft x 40ft autoclaves that will be set into the ground[1], a 2,010 ft^2 H-1 storage building, and dust collectors.

Access and Parking

Access to the project site would be via an access road/driveway that extends from Imjin Road to the southeast corner of the project site, adjacent to an existing hangar. The access road/driveway would be separated from aircraft operational areas with security fencing. Surface parking would be provided for staff and visitors on the eastern portion of the project site (**Figure 3** and Sheet A101 in **Appendix A**). The project would include a total of 627 parking spaces. If the project is phased, 304 parking spaces would be constructed as part of the Phase 1 of development and 323 parking spaces would be constructed as part of the Phase 2. Approximately 10% of all parking spaces would have electric vehicle type charging stations. Additionally, a structured carpool and shuttle service would be provided to employees, with the anticipation that 20% of total staff would be commuting in this manner. On-site bike storage would also be provided to encourage bicycle commuting.

[1] Autoclaves would extend approximately five feet into the building.



LEGEND

- JOBY - PHASE 1 MANUFACTURING BUILDING
- JOBY - PHASE 2 MANUFACTURING BUILDING
- APPROXIMATE EXTENT OF NEW PAVING
- DETENTION BASIN - PHASE 1
- DETENTION BASIN - PHASE 2
- LANDSCAPING - PHASE 1 (SEE LANDSCAPING DRAWINGS)
- LANDSCAPING - PHASE 2 (SEE LANDSCAPING DRAWINGS)
- JOBY - APPROVED TENT
- AIRPORT - EXISTING BUILDING
- AIRPORT - ULTIMATE/FUTURE BUILDING
- AIRPORT - TAXILANE OBJECT FREE AREA
- AIRPORT PROPERTY LINE
- PROJECT BOUNDARY

KEY NOTES

1. PHASE ONE PARKING
2. PHASE TWO PARKING SHOWN GREY
3. H-1 STORAGE
4. AUTOCLAVE
5. COOLING TOWER
6. GAS TANKS
7. DUST COLLECTORS
8. NEW FENCE, SEE A102 FOR ADDITIONAL INFORMATION. FENCE TO ALIGN WITH LEASE LINE
9. TRASH COMPACTORS
10. TRUCK LOADING DOCK
11. 28'-0" FIRE TRUCK TURNING RADIUS
12. LOCATION OF NEW CAMPUS SIGN, SEE 1/A113
13. LOCATION OF NEW BUILDING SIGN, SEE 2/A113 - "MANUFACTURING FACILITY"
14. LOCATION OF NEW BUILDING SIGN, SEE 2/A113 - "METAL PRINTING ROOM"
15. LOCATION OF NEW DIRECTIONAL SIGN, SEE 3/A113 - "VISITOR LOBBY"
16. LOCATION OF NEW DIRECTIONAL SIGN, SEE 3/A113 - "SHIPPING/RECEIVING"
17. LOCATION OF NEW DIRECTIONAL, SEE 3/A113 - "ADMINISTRATIVE OFFICES"
18. LOCATION OF NEW DIRECTIONAL, SEE 3/A113 - "EXIT"
19. NEW SIDEWALK
20. NEW CURB CUT FOR ACCESSIBILITY
21. NEW CURB CUT FOR VEHICLE ACCESS

Source:
Wald Ruhnke & Dost Architects LLC, December 2019

Site Plan

Denise Duffy and Associates, Inc.
Planning and Environmental Consulting

Date: 12-06-2019

Figure: 3

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Landscape and Irrigation

The project includes approximately 0.4 acre of landscaping in the parking area and 0.3 acre within the detention basin. Landscaping would conform to City landscaping requirements, and would include native, drought-tolerant plants (see Sheets L-1.0 to L-1.2 in **Appendix A**). An irrigation system would be installed that meets current water efficiency standards (see Sheet L-2.0 in **Appendix A**).

Utilities

Domestic Water

Domestic water service provides water for the interior (domestic) uses, manufacturing processes, and landscape irrigation. The Marina water supply system is owned and operated by the Marina Coast Water District (MCWD), a County Water District organized and operating under the County Water District Law, Water Code §30000. New water system piping would be installed and would connect to the existing City water supply system located on the western side of the project site (see Sheet C2 in **Appendix A**). If the project is phased, it is anticipated that Phase 1 would use approximately 5.74 acre feet per year (AFY) of water and the project would use approximately 14.92 AFY at final build-out.

Wastewater System

The project site would receive sanitary sewer collection service from MCWD. The project would be served by a sanitary sewer main connecting to the existing City sewer line located on the southern border of the project site (see Sheet C2 in **Appendix A**). Wastewater would be treated at the Monterey One Water (M1W) wastewater treatment plant, located northwest of the project site within the City.

Natural Gas and Electricity

Pacific Gas and Electric Company (PG&E) would provide natural gas and Monterey Bay Community Power (MBCP) and PG&E would provide electricity service to the project site. A natural gas line would tie into existing infrastructure within Imjin Road. Power lines would be underground and tie into existing overhead electricity lines on Imjin Road (see Sheet C2 in **Appendix A**).

Storm Drainage

Stormwater would be dispersed and percolated on site through the use of underground infiltration chambers and a surface retention pond (see Sheets C1 and C2 in **Appendix A**). If the project is phased, a 0.5 acre detention basin will be constructed for Phase 1, then expanded to 1.1 acre for Phase 2.

Site Fencing and Security

The project site would include a 10 foot tall fence that meets all federal standards for security (see Sheet A102 in **Appendix A**). In addition, a new site gate would be installed as part of the project with secure access. The fencing and gate would be secured by cameras and electronic readers for authorized personnel only. The buildings would be equipped with multiple security cameras to monitor interior and exterior areas, as well as security access into the buildings.

Lighting

Outdoor site lighting would be pole mounted and shielded and directed downward in conformance with City and FAA requirements.

Grading

The project site is relatively flat; however, some grading would be necessary on the majority (24 acres) of the project site to a depth of approximately two feet. Approximately 28,500 cubic yards (CY) of cut and 28,500 CY of fill are anticipated (see Sheet C1 in **Appendix A**). Existing paving to be removed (approximately 23,000 CY) would be crushed and used as engineered fill. No grading materials would be exported from the site or would be required to be imported onto the site.

As identified above, the former Fort Ord was used for training military personnel with equipment and munitions. These training activities left behind munitions and explosives of concern (MEC). The Marina Airport has been evaluated for the presence of MEC and, in 1995, the majority of the airport[2], including the project site, was determined to be suitable to the City for general aviation purposes (Army, 1995)[3]. However, even following the Army's completion of MEC response actions, it is possible that some MEC may remain within former Fort Ord parcels, and the Department of Toxic Substances Control (DTSC) cannot certify that all MEC has been cleared. The project site is identified on the grading district map as an area with the potential for MEC. As such, project grading would be subject to specific conditions identified on the grading permit and in City Code (Chapter 15.56).

Operations

Operations proposed within the new building include manufacturing, composite fabrication, assemblage of aircraft, parts testing, and research and development. The manufacturing process includes aircraft part layup, oven curing, trimming, adhesive bonding, and painting. Operations would also include aircraft testing and integration. All manufacturing would be conducted within the building.

Operations would occur 24 hours per day, 7 days per week. If the project is phased, Phase 1 peak manufacturing staff levels are anticipated as follows:

- 6:00 am to 3:00 pm shift – 300 persons
- 3:00 pm to 9:00 pm shift – 250 persons
- 9:00 pm to 6:00 am shift – 250 persons

At final build-out, the staff levels at peak manufacturing are anticipated as follows:

- 6:00 am to 3:00 pm shift – 600 persons
- 3:00 pm to 9:00 pm shift – 500 persons
- 9:00 pm to 6:00 am shift – 500 persons

Operations would also include utilization of taxiways and remote test areas on the Airport for propulsion testing, antenna performance testing, acoustics measurement testing, hover testing and flight-testing. If the project is phased, Phase 1 would include two to five flights out of the Airport per day, including helicopter flights. At final build-out, approximately 10-20 company flights out of Airport per day would occur, plus 10 or more helicopter flights per day. The project would not have an impact on flight patterns or to the existing runway. There would be no change in airfield configuration or impact on airfield navigation aids. There would be some night work, as identified above, but the all operations would be conducted indoors and would not affect airfield operations. It is expected that there would be an increase in air traffic and use of the airport once Joby is located there.

[2] This area is identified as Phase I in the Finding of Suitability to Transfer (FOST; Army, 1995).

[3] MEC cleanup activities were implemented in the remaining portions of the airport (Phase II), north of the project site, which was transferred at a later date.

E. CONSTRUCTION SCHEDULE, STAGING, AND EQUIPMENT

Construction of the project is expected to occur over a period of 15 months, beginning early in 2020 and continuing until the anticipated completion in mid-2021. If the project is phased, Phase 1 construction would occur within the same time frame, while Phase 2 would be completed within three to five years after the first phase is operational over an approximate 15 month construction period. Construction would be from Monday through Saturday between the hours of 7 AM to 5 PM (no night-time construction).

In support of these activities and for the assumptions for this document, the types of equipment that may be used at any one time during construction may include, but not be limited to:

- Excavator,
- Concrete truck,
- Crane,
- Backhoe,
- Dump truck,
- Delivery truck,
- Water truck,
- Asphalt paver,
- High reach forklift, and
- McCloskey International 154 crusher (or similar).

If the building is constructed all at once, construction staging would occur in areas designated for Phase 2 parking. However, if the project is phased, construction staging for Phase 1 would be located on future Phase 2 development areas and Phase 2 construction staging would occur in areas designated for Phase 2 parking.

F. PROJECT APPROVALS AND PERMITS REQUIRED

The project site is located within the City of Marina. The project would require the following permits and approvals:

- City of Marina – Grading Permit, , Fire Department Review, Site and Architectural Design Review (Planning Commission approval);
- Monterey Bay Air Resources District – Authority to Construct and Permit to Operate;
- Marina Coast Water District – Water and Sewer Permits
- Regional Water Quality Control Board – National Pollution Discharge Elimination System (NPDES) General Construction Permit;
- State of California Water Resources Control Board Permits – Stormwater Pollution Prevention Plan (SWPPP)
- Monterey County Airport Land Use Commission;
- Monterey County Environmental Health Permit; and
- Federal Aviation Administration – Design Approval and Approval of Construction Safety and Phasing Plans.

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III. PROJECT CONSISTENCY WITH OTHER APPLICABLE LOCAL AND STATE PLANS AND MANDATED LAWS

Use the list below to indicate plans applicable to the project and verify their consistency or non-consistency with project implementation.

General Plan/Area Plan	☒	Air Quality Mgmt. Plan	☒
Specific Plan	☐	Airport Land Use Plans	☒
Water Quality Control Plan	☒	Local Coastal Program-LUP	☐

The project is consistent with the following applicable plans and regulatory documents; additional specific consistency information is discussed in the sections identified:

- City of Marina General Plan (City, 2010a) — See *Sections VI.7 Geology and Soils*, *VI.8 Greenhouse Gas Emissions, VI.9 Hazards and Hazardous Materials, VI.10 Hydrology and Water Quality*, *VI.11 Land Use and Planning*, *VI.13 Noise*, *VI.14 Population and Housing*, *VI.15 Public Services*, *VI.16 Recreation*, *VI.17 Transportation* and *VI.19 Utilities*

- City of Marina Pedestrian and Bicycle Master Plan (City, 2010b) — See *Section VI.17 Transportation*

- County of Monterey General Plan (County, 2010) — See *Sections VI.11 Land Use and Planning*, *VI.14 Population and Housing*, *VI.15 Public Services*, *VI.16 Recreation, VI.17 Transportation* and *VI.19 Utilities*

- Fort Ord Reuse Plan (FORA, 1997) — See *Section VI.11 Land Use and Planning*

- Installation-Wide Multispecies Habitat Management Plan for Former Fort Ord (HMP) (USACE, 1997) — *See Sections VI.4 Biological Resources* and *VI.11 Land Use and Planning*;

- Marina Municipal Airport Land Use Compatibility Plan (ALUCP) (County of Monterey Airport Land Use Commission, 2019) — See *Sections VI.9 Hazards and Hazardous Materials, VI.11 Land Use and Planning* and *VI.13 Noise*;

- Marina Municipal Airport Master Plan – Final Report (Airport Master Plan) (City, 2018a) and Marina Municipal Airport Final Mitigated Negative Declaration and Initial Study on the Proposed Airport Master Plan (Airport Master Plan IS/MND) (City, 2018b) — See Section *VI.1 Aesthetics*, *VI.3 Air Quality*; *VI.5 Cultural Resources* (except as identified below), *VI.9 Hazards and Hazardous Materials, VI.10 Hydrology and Water Quality*, *VI.17 Transportation* and *VI.19 Utilities*;

- Reinitiation of Formal Consultation for Cleanup and Property Transfer Actions Conducted at the Former Fort Ord, Monterey County, California (Programmatic BO) (USFWS, 2017) — See *Section VI.4 Biological Resources*.

- 2012-2015 Air Quality Management Plan (AQMP) (MBARD, 2017) — See *Section VI.3 Air Quality*.

A. INCONSISTENCIES

Mitigation measure CR/mm-1 in the Airport Master Plan IS/MND recommends a records search and preparation of a cultural resources assessment and technical report be prepared for future projects within the Airport, as recommended in the Cultural Resources Constraints Analysis. However, these actions were not conducted for the project because it was determined that the evaluation conducted for the Airport Master Plan sufficiently evaluates the project site and a project-specific assessment is not necessary. Additional detailed information regarding this inconsistency with the Airport Master Plan IS/MND is discussed in *Section VI. 5 Cultural Resources*.

The City's General Plan provides thresholds for assessing project-level impacts in level of service (LOS). However, Senate Bill (SB) 743 creates a process to change the way that CEQA addresses transportation impacts. Specifically, the Governor's Office of Planning and Research (OPR) is required to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Measurements of transportation impacts may include vehicle miles traveled (VMT), vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated" (Ibid.). Once the CEQA Guidelines are amended to include those alternative criteria, auto delay will no longer be considered a significant impact under CEQA. SB 743 also amends congestion management law to allow cities and counties to opt out of LOS standards within certain infill areas. The CEQA Guideline changes proposed by OPR are still in draft form as of the writing of this IS; however, in an effort to use the most current and soon to be required approach, traffic impacts potentially resulting from the project are evaluated using VMT, rather than LOS. Additional detailed information regarding this inconsistency with the Airport Master Plan IS/MND is discussed in *Section VI. 17 Transportation.*

IV. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

A. FACTORS

The environmental factors identified below are discussed within *Section VI. Environmental Checklist*. The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages. Sources used for analysis of environmental effects are cited in the checklist and listed in *Section IX. References*.

☐ Aesthetics	☐ Agriculture/Forestry Resources	☐ Air Quality
☒ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology and Soils	☐ Greenhouse Gas Emissions	☒ Hazards/Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☒ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

Some proposed applications that are not exempt from CEQA review may have little or no potential for adverse environmental impact related to most of the topics in the Environmental Checklist; and/or potential impacts may involve only a few limited subject areas. These types of projects are generally minor in scope, located in a non-sensitive environment, and are easily identifiable and without public controversy. For the environmental issue areas where there is no potential for significant environmental impact (and not checked above), the following finding can be made using the project description, environmental setting, or other information as supporting evidence.

☒ Check here if this finding is not applicable

FINDING: For the above referenced topics that are not checked off, there is no potential for significant environmental impact to occur from either construction or operation of the proposed project.

EVIDENCE: Evidence for findings of no potential significant environmental impacts from construction and/or operation of the project for referenced topics not checked off are discussed in each individual topic subsection of *Section VI. Environmental Checklist*.

B. DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	Date
PLANNER NAME	*TITLE*

V. EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on project-specific screening analysis).

2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

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VI. ENVIRONMENTAL CHECKLIST

1. AESTHETICS **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista? (Source: 14)	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (Source: 9, 18)	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (Source: 11)	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Source: 1, 15)	☐	☐	☒	☐

Setting

The project site is located within the former Fort Ord, which includes areas of notable visual resources. However, the site is in a developed area of the former Fort Ord which is zoned for industrial use, and is comprised of mostly paved roads and tarmacs with isolated patches of native and non-native vegetation. There are no designated scenic resources or roadways within the City of Marina; however, the County identifies the Reservation Road Corridor east of Blanco Road as having visual sensitivity and as a proposed scenic route (County of Monterey, 2010).

The State Scenic Highways Program is designed to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. The nearest designated or eligible scenic highways are the portion of Highway 1 located approximately two miles west of the project site and Highway 68, located approximately six miles from the site (Caltrans, 2017). The project site is not visible from these highways.

Discussion/Mitigation

a) Would the project have a substantial adverse effect on a scenic vista? ***No Impact.***

As identified above, there are no scenic vistas located on or surrounding the site that are available to the public. Additionally, the project site is located within the Airport Master Plan and the IS/MND prepared for the Airport Master Plan determined that new development within the Airport would not affect scenic views of inland hills from Reservation Road or Blanco Road. Therefore, the project would have no impact on scenic vistas.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? ***No Impact.***

The project site is not visible from Highway 1 or Highway 68, portions of which are designated or eligible State Scenic Highways. Although the County identifies the nearby Reservation Road Corridor just east of Blanco Road as having visual "sensitivity" and as a proposed scenic route, new development within the Airport would not affect scenic views from this road, and no scenic resources are present within the project site or would be damaged by the project. Therefore, the project would have no impact on scenic resources, including scenic resources within a scenic highway corridor.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? ***No Impact.***

The project site is located in an urbanized area and is zoned for light industrial use (see *Section VI.11, Land Use and Planning*). The manufacturing facility would be consistent with and would have no impact on applicable zoning and regulations governing scenic quality.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ***Less Than Significant Impact.***

Lighting and sources of glare within the project site would be controlled by both the FAA and the City, whose Municipal Code for its Airport District states that "all new exterior lighting within the Airport planning area shall be designed so as to create no glare or interference with aircraft in flight." Conformance with this stipulation would also protect adjacent land uses from substantial sources of light. Specifically, lighting would be pole mounted, shielded, and directed downwards in conformance with FAA and City requirements (see Sheets E1.0 through E3.1 in **Appendix A**). Therefore, the project would have a less than significant impact on day or nighttime views from new lighting sources and glare.

Conclusion

The project would have a less than significant impact on aesthetics.

2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forestry resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (Source: 6)	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? (Source: 11, 20)	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? (Source: 11)	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use? (Source: 11)	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? (Source: 6, 20)	☐	☐	☐	☒

Setting

In California, agricultural land is given consideration under CEQA. According to Public Resources Code (PRC) §21060.1, "agricultural land" is identified as prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture (USDA) land inventory and monitoring criteria, as modified for California. Farmland, including prime and unique farmland, occurs approximately 0.5 mile from the project site across the Salinas River; however, no farmland is present within the site, which is defined as urban and built-up land on the most recent Important Farmland Map for the County (California Department of Conservation, 2016). The project site does not contain lands under Williamson Act contract (County, 2018b).

CEQA requires the evaluation of forest and timber resources where they are present. The project site is zoned for industrial use. The site does not contain any forest land as defined in PRC §12220(g), timberland as defined by PRC §4526, or property zoned for Timberland Production as defined by Government Code section 51104(g).

Discussion/Mitigation

a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?* ***No Impact.***

b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?* ***No Impact.***

c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?* ***No Impact.***

d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?* ***No Impact.***

e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?* ***No Impact.***

No farmland is present within the site, which is defined as urban and built-up land on the most recent Important Farmland Map for the County. In addition, there are no Williamson Act contracts, forest land, or timberland within or near the project site. Therefore, the project would not result in loss or conversion of farmland, forest land, or timberland, and would have no impact on these resources.

Conclusion

The project would have no impact on agriculture and forestry resources.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan? (Source: 32, 34)	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality? (Source: 3, 32, 34)	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations? (Source: 4, 32, 34, 51)	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Source: 32, 34)	☐	☐	☒	☐

Setting

Existing Air Quality and Basin Attainment Status

The Federal Clean Air Act and the California Clean Air Act mandate the control and reduction of specific air pollutants. Under these Acts, the United States Environmental Protection Agency (EPA) and the California Air Resources Board (ARB) have established ambient air quality standards for specific "criteria" pollutants, designed to protect public health and welfare. Primary criteria pollutants include carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxides (NO_X), particulate matter (PM_{10}), sulfur dioxide (SO_2), and lead (Pb). Secondary criteria pollutants include ozone (O_3), and fine particulate matter ($PM_{2.5}$).

The project site is located within the North Central Coast Air Basin (NCCAB), which is comprised of Santa Cruz, San Benito, and Monterey Counties, and is regulated by the Monterey Bay Air Resources District (MBARD, formally known as Monterey Bay Unified Air Pollution Control District).

The EPA administers the National Ambient Air Quality Standards (NAAQS) under the Federal Clean Air Act. The EPA sets the NAAQS and determines if areas meet those standards. Violations of ambient air quality standards are based on air pollutant monitoring data and evaluated for each air pollutant. Areas that do not violate ambient air quality standards are considered to have attained the standard. The NCCAB is in attainment for all NAAQS and for all California Ambient Air Quality Standards (CAAQS) except O_3 and PM_{10}. The primary sources of O_3 and PM_{10} in the NCAAB are from automobile engine combustion. To address exceedance of these CAAQS, the MBARD has developed and implemented several plans including the 2005 Particulate Matter Plan, the 2007 Federal Maintenance Plan, and the 2012-2015 Air Quality Management Plan (AQMP), a revision to the 2012 Triennial Plan. NCCAB Attainment Status to National and California Ambient Air Quality can be found in **Table 3-1** below.

Table 3-1. NCCAB Attainment Status Summary

Pollutant	State Standards	National Standards
Ozone (O_3)	Nonattainment[1]	Attainment/Unclassified[2]
Inhalable Particulates (PM_{10})	Nonattainment	Attainment
Fine Particulates ($PM_{2.5}$)	Attainment	Unclassified/Attainment [3]
Carbon Monoxide (CO)	Monterey County-Attainment San Benito County-Unclassified Santa Cruz County-Unclassified	Attainment/Unclassified
Nitrogen Dioxide (NO_2)	Attainment	Attainment/Unclassified[4]
Sulfur Dioxide (SO_2)	Attainment	Attainment[5]
Lead	Attainment	Attainment/Unclassified[6]

Notes:

[1] Effective July 26, 2007, the ARB designated the NCCAB a nonattainment area for the State ozone standard, which was revised in 2006 to include an 8-hour standard of 0.070 ppm.

[2] On March 12, 2008, EPA adopted a new 8-hour ozone standard of 0.075 ppm. In April 2012, EPA designated the NCCAB attainment/unclassified based on 2009-2011 data.

[3] This includes the 2006 24-hour standard of 35 μg/m3 and the 2012 annual standard of 12 μg/m3.

[4] In 2012, EPA designated the entire state as attainment/unclassified for the 2010 NO_2 standard.

[5] In June 2011, the ARB recommended to EPA that the entire state be designated as attainment for the 2010 primary SO_2 standard. Final designations to be addressed in future EPA actions.

[6] On October 15, 2008 EPA lowered the NAAQS for lead to 0.15 $\mu g/m^3$. Final designations were made by EPA in November 2011.

Source: ARB 2018, MBARD 2018a.

Plans to attain these standards already accommodate the future growth projections available at the time these plans were prepared. Any development project capable of generating air pollutant emissions exceeding regionally-established criteria is considered significant for purposes of CEQA analysis, whether or not such emissions have been accounted for in regional air planning. Furthermore, any project that would directly cause or substantially contribute to a localized violation of an air quality standard would generate substantial air pollution impacts. The same is true for a project that generates a substantial increase in health risks from toxic air contaminants (TACs) or introduces future occupants to a site exposed to substantial health risks associated with such contaminants.

Toxic Air Contaminants

TACs are a broad class of compounds known to cause morbidity or mortality, as they are known or suspected to cause cancer and serious illness. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level.

Exhaust from trucks, buses, trains, ships, and other equipment with diesel engines contains a mixture of gases and solid particles. These solid particles are known as diesel particulate matter (DPM). DPM contains hundreds of different chemicals which can have harmful health effects, such as cardiovascular and respiratory disease.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three quarters of the cancer risk from TACs. According to the California ARB, diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have

been previously identified as TACs by California ARB, and are listed as carcinogens either under California Proposition 65 or under the Federal Hazardous Air Pollutants programs.

Sensitive Receptors

Sensitive receptors are defined as facilities where sensitive population groups are located, including residences, schools, childcare centers, convalescent homes, and medical facilities. Land uses such as schools and hospitals are considered more sensitive than the general public to poor air quality because of an increased susceptibility to respiratory distress within the populations associated with these uses. The closest sensitive receptors to the project site are located within the UC MBEST Center, which lies 250 ft. to the southwest of the project entry. In addition, single-family housing existing approximately 2,000 ft. to the southwest, across Reservation Road.

Thresholds of Significance

The MBARD provides guidance in assessing air quality impacts related to proposed projects. In 2008, MBARD adopted new CEQA Air Quality Guidelines that included thresholds of significance to assist in the review of projects under CEQA. The significance thresholds, all of which except greenhouse gas (GHG) emissions, are adopted thresholds of the MBARD and used in this analysis, are summarized in **Table 3-2**.

Table 3-2. Air Quality Significance Thresholds

Criteria Pollutant	Construction Thresholds	Operational Thresholds
	Maximum Daily Emissions (lbs/day)	**Average Daily Emissions (lbs/day)**
Criteria Air Pollutants		
Volatile organic compound (VOC) or Reactive Organic Gases (ROG)	Not applicable[1]	137
Nitrogen oxides (NO_x)	Not applicable[1]	137
Carbon monoxide (CO)	Not applicable	550
Particulate matter with aerodynamic diameter < 10 micrometers (PM_{10})	82 (on-site)[2]	82 (on-site)[2]
Sulfur dioxide (SO_2)	Not applicable	150
Toxic Air Contaminants		
Increased cancer risk due to exposure to toxic air contaminants	10 in one million	

Notes:

[1]The MBARD applies the emission threshold of 137 pounds per day of ROG or NOx to construction activities that involve non-typical equipment (i.e., grinders, and portable equipment). The MBARD specifies examples of typical equipment as scrapers, tractors, dozers, graders, loaders, and rollers (MBARD, 2008; see page 5-3 at: http://mbuapcd.org/pdf/CEQA_full%20%281%29.pdf).

[2] Emissions exceeding these thresholds are considered significant if dispersion modeling shows that the ambient air quality standard for that pollutant would be exceeded. Since air pollutant dispersion modeling was not conducted for this project, the emissions thresholds are used to judge the significance. This threshold applies to stationary sources, not indirect sources.

Discussion/Mitigation

a) Would the project conflict with or obstruct implementation of the applicable air quality plan? ***Less Than Significant Impact.***

CEQA Guidelines §15125(b) requires that a project is evaluated for consistency with applicable regional plans, including the AQMP. As stated above, the MBARD has developed and implemented several plans to address exceedance of state air quality standards, including the MBARD 2012-2015 AQMP. The MBARD is required to update their AQMP once every three years; the most recent update was approved in March 2017. This plan addresses attainment of the state ozone standard and federal air quality standard. The AQMP accommodates growth by projecting growth in emissions based on population forecasts prepared by the Association of Monterey Bay Area Governments (AMBAG) and other indicators.

Although the project will result in additional jobs, the project would not result in a substantial increased population growth, as outlined in *Section VI.14. Population and Growth* below. As noted in the Airport Master Plan, the project would be consistent with the MBARD 2012-2015 AQMP. ROG emissions from stationary sources, which include airports, are expected to grow from 9.70 tons per day in 2015 to 10.82 tons per day in 2035. Oxides of nitrogen are also included in the inventory and are anticipated to increase from 8.26 tons per day in 2015 to 9.86 tons per day in 2035.[4] As a comparison, the emissions attributed to operations at the project are 0.02 tons per day for both ROG and NO_x (see **Table 3-3** below). In addition, as noted in Response b, below, the project would not result in a significant increase in emissions. For these reasons, implementation of the project is not anticipated to result in a substantial increase in either direct or indirect emissions that would conflict with or obstruct implementation of the AQMP; this impact is considered less than significant.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality? ***Less Than Significant Impact.***

The project would generate both operational and construction air pollutants. **Table 3-3** identifies anticipated air quality emissions associated with the project based on the results of modeling conducted by Denise Duffy & Associates, Inc. (DD&A) using the California Emission Estimator Model (CalEEMod). A copy of the CalEEMod results is included in **Appendix B.**

Table 3-3. Construction & Operational Air Quality Emissions

Pollutant	Construction (lbs/day)	Operation (lbs/day)	Exceed Threshold?
ROG	3.459	19.432	No
NO_x	32.060	25.468	No
CO	25.684	53.014	No
PM_{10}	4.815	10.982	No
$PM_{2.5}$	2.361	3.243	No
Source: MBARD, 2008			

Construction

Grading and filling during construction could result in impacts to air quality. Site disturbance activities could result in short-term, localized decrease in air quality due to the generation of PM_{10}. As noted in **Table 3-3** all construction-related emissions would be below the applicable MBARD thresholds of

[4] *2012-2015 Air Quality Management Plan*, Table 4-1 Emission Inventory and Forecasts for NO_x and Table 4-2 Emissions Inventory and Forecasts for ROG.

significance for temporary construction emissions. Further, according to the MBARD's criteria for determining construction impacts (as updated February 2008), a project would result in a potentially significant impact if it would result in 8.1 acres of minimal earthmoving per day or 2.2 acres per day with major grading and excavation. The project proposes to only grade up to 0.75 acres per day and as a result the project is below the threshold. Temporary construction-related emissions would be less than significant. In addition, the project would also implement standard construction Best Management Practices (BMPs) related to dust suppression as identified by MBARD, which would include:

1. Watering active construction areas;
2. Prohibiting grading activities during periods of high wind (over 15 mph);
3. Covering trucks hauling soil;
4. Covering exposed stockpiles and inactive storage piles;
5. Haul trucks shall maintain at least 2 ft. of freeboard;
6. Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydro seed area; and,
7. Sweep streets if visible soil materials are carried out from the construction site. The implementation of BMPs would further ensure that potential construction-related emissions would be minimized.

Since the project is under the threshold for construction air quality impacts, this impact is considered less than significant.

Operation

Monterey County is a NCCAB nonattainment area for O_3 and PM_{10}. Implementation of the project could generate additional criteria air pollutant and TAC emissions from a variety of emission sources, including welding, machining, cutting & grinding, and blasting. In addition, aircraft painting produces VOCs.[5] Additionally, vehicle trips to and from the project, and their related emissions, would be considered a source of air pollutants. These emissions would be below applicable MBARD thresholds of significance based on the CalEEMod results identified in **Table 3-3**.

In conclusion, project construction and operation would not result in a significant air quality impact. As stated above, all impacts would be below applicable MBARD thresholds of significance. As there are no significant impacts, project construction and operation would not result in a cumulatively considerable net increase in any criteria pollutant. Air quality impacts associated with the project would result in a less-than-significant impact.

c) Would the project expose sensitive receptors to substantial pollutant concentrations? ***Less Than Significant Impact.***

Project impacts related to increased health risk can occur either by introducing a new sensitive receptor, such as a residential use, in proximity to an existing source of TACs or by introducing a new source of TACs with the potential to adversely affect existing sensitive receptors in the project area. The project has the potential to generate TACs during both construction and operational activities, as discussed below.

Short-term Construction Emissions and Exposure to TACs at Surrounding Land Uses

The project would expose sensitive receptors, including students attending schools located within the UC MBEST Center and residents (to a lesser extent) to the southwest as well as workers at the existing

[5] For purposes of this Initial Study, ROG and VOC are considered equivalent.

airfield adjacent to the northwest, to temporary emissions of TACs while construction takes place in the vicinity of these receptors. The primary health risks associated with construction emissions are cancer risk and exposure to particulate matter. In addition, diesel exhaust poses both a potential health and nuisance impact to nearby receptors.

CalEEMod provided total uncontrolled annual PM_{10} exhaust emissions (assumed to be DPM) for the off-road construction equipment and for exhaust emissions from on-road vehicles. The on-road emissions are a result of haul truck travel during grading activities, worker travel, and vendor deliveries during construction. Based on the CalEEMod-modeled emissions estimates, the PM_{10} emission concentrations from exhaust generated by the off-road equipment would be a maximum of 0.906 lbs/day during construction.

Receptor dose is the primary factor used to determine health risk and is a function of exposure concentration and duration. Most DPM emissions associated with material delivery trucks and construction worker vehicles would occur off-site. Further, concentrations of mobile-source DPM emissions are typically reduced by approximately 60 percent at a distance of around 300 feet (100 meters). As a result, mobile-source DPM emissions from construction at the site are not expected to be substantial, except potentially in the immediate vicinity of the construction site, having a minimal impact to residences that are over 2,000 ft. to the southwest. Although UC MBEST is present near the southwestern boundary of the project site, construction activities would be dispersed throughout the 25.7-acre project site, so the majority of construction activities would take place farther than 300 feet from the school.

The use of newer off-road equipment is also effective in reducing PM emissions from off-road equipment used during construction; while not required, these vehicles are increasingly in use in construction equipment fleets. In January 2001, EPA promulgated a final rule to reduce emissions standards for heavy-duty diesel engines in the 2007 and subsequent model years. These emissions standards represent emissions reductions of 90 percent for NO_X, 72 percent for nonmethane hydrocarbons, and 90 percent for PM, in comparison to the emissions standards for the 2004 model year. In December 2004, ARB adopted a fourth phase of emission standards (Tier 4) in the Clean Air Non-Road Diesel Rule that were nearly identical to those finalized by EPA earlier that year. The Tier 4 emission standards required engine manufacturers to meet after-treatment-based exhaust standards for NO_X and PM, starting in 2011, that were more than 90 percent lower than the current levels, putting emissions from off-road engines virtually on par with those from on-road heavy-duty diesel engines.

Construction activities for the project are anticipated to last approximately 15 months and would cease after completion of the project. Even during this period of time, construction activities would vary in activity and equipment intensity, and would take place throughout the project site. As stated above, dose is a function of concentration and time, meaning the longer the period of exposure of a TAC to a sensitive receptor the higher the level of exposure and thus the greater the risk. The exposure of sensitive receptors to construction emissions from the project would be short-term, intermittent, and temporary.

Because the construction activities that could result in TAC emissions would be temporary, in combination with the dispersive properties of DPM, and the fact that PM emissions would be less than MBARD emission thresholds, short-term construction would not expose sensitive receptors to substantial DPM emission levels. As a result, this impact would be less than significant.

Long-term Operation and Exposure of Sensitive Receptors to TACs from Operational Uses

Potential long-term exposure to TACs would be primarily associated with the aviation manufacturing facility would include heavy metals used during welding, machining, cutting & grinding, and blasting

as well as aircraft painting (which would be conducted inside the building). In addition, the project would result in an increase in daily traffic trips to and from the project site by both passenger cars for staff and large trucks for deliveries, which would result in an increase in mobile-source CO and PM emissions. As previously mentioned, the UC MBEST Center is located 250 ft. to the southwest of the project entry. In addition, single-family housing existing approximately 2,000 ft. to the southwest, across Reservation Road. The increase in the emissions of TACs near a sensitive receptor is anticipated to have a health risk due to exposure of sensitive receptors as well as offsite workers to TAC emissions. MBARD's Rule 200 requires any business to obtain an Authority to Construct (ATC) and Permit to Operate before installing or operating new equipment or processes that may release or control air pollutants to ensure that all MBARD rules and regulations are considered.

As part of the MBARD permitting process, the MBARD will conduct a New Source Review which will in-turn include a Health Risk Assessment (HRA). The HRA would be used to determine the potential cancer risk that would be generated as a result of the project, these results shall be compared to the MBARD significance threshold for probability of cancer of greater than 10 in one million. Should the HRA results indicate a health risk that exceeds the above MBARD significance threshold, the HRA would be required by MBARD to conduct public notification and outline a plan to implement risk reduction measures. The documents would be included in the MBARD Permit to Operate and would describe the risk reduction methods the project would use to reduce its risk below the level of significance. In addition, as part of the Permit to Operate, the applicant would conduct performance testing and inspection of the project TAC emissions as determined appropriate by MBARD and provide all inspection documentation to the MBARD. The frequency of inspections and reporting would be determined by MBARD and made a condition of approval in the MBARD Permit to Operate as well as any other conditions as detailed per MBARD permit requirements. With compliance with MBARD permit requirements, the proposed project would have a less-than-significant impact to sensitive receptors due to long-term operations.

d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?* ***Less Than Significant Impact****.*

Common sources of odors and odor complaints include wastewater treatment plants, transfer stations, coffee roasters, painting/coating operations, and landfills. The project is located adjacent to an airport and other similar uses that are not common sources of odors. As a result, project operation will have similar odors as those already being emitted in the project vicinity. There may be intermittent odors from construction associated with diesel exhaust that could be noticeable at times to sensitive receptors in close proximity. However, given the limited construction duration, potential intermittent odors are not anticipated to result in odor complaints and would not affect a substantial number of people.

Conclusion

The project would have a less-than-significant impact on air quality with implementation of BMPs and local permitting requirements identified above.

4. BIOLOGICAL RESOURCES **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Source: 22, 44, 47, 49, 50)	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (Source: 22)	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (Source: 22)	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (Source: 22, 47)	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Source: 11, 13, 14, 22, 44, 47)	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (Source: 22, 47)	☐	☒	☐	☐

Setting

The analysis presented in this section is from information contained in the Biological Resources Report prepared for the project by DD&A dated December 2019 (**Appendix C**). The Biological Resources Report describes existing biological resources within and surrounding the project, identifies any special-status species and sensitive habitats within and adjacent to the project site, assesses potential impacts that may occur to biological resources, and recommends appropriate avoidance, minimization, and mitigation measures necessary to reduce those impacts to a less-than-significant level.

DD&A conducted surveys of the project site in April, May, and June 2019. Details, methods and data sources used for the botanical survey and reconnaissance-level wildlife habitat surveys can be found in **Appendix C**. Data collected during the surveys were used to assess the environmental conditions of the

project site and its surroundings, evaluate environmental constraints at the site and within the local vicinity, and provide a basis for recommendations to minimize and avoid impacts.

Vegetation communities within the project site include 0.5 acre of white-tip clover swale and 2.0 acres of ruderal/disturbed (**Figure 4**). In addition, approximately 23.2 acres of the site is developed. White-tip clover swale is listed as sensitive on the CDFW's *California Natural Communities List* (CDFW, 2018a). Additionally, a wetland assessment of the white-tip clover swale was conducted in accordance with USACE protocols; however, it was determined the site does not meet the parameters to be considered a jurisdictional wetland.

Several special-status species are known or have a moderate or high potential to occur within or directly adjacent to the project site based on observations, presence of appropriate habitat, and documented occurrences within the vicinity. All other species evaluated have a low potential to occur, are assumed unlikely to occur, or were determined not present within the project site for the species-specific reasons presented in Appendix A of the Biological Resources Report (**Appendix C**).

The following special-status wildlife species are known or have the potential to occur on the project site:

- Northern California legless lizard (*Anniella pulchra*) – CSC/HMP[6]
- Coast horned lizard (*Phrynosoma blainvillii*) – CSC; and
- California horned lark (*Eremophila alpestris actia*) – WL.

One special-status plant species is known to occur within the project site (**Figure 5**):

- Monterey spineflower (*Chorizanthe pungens* var. *pungens*) – FT/1B/HMP.

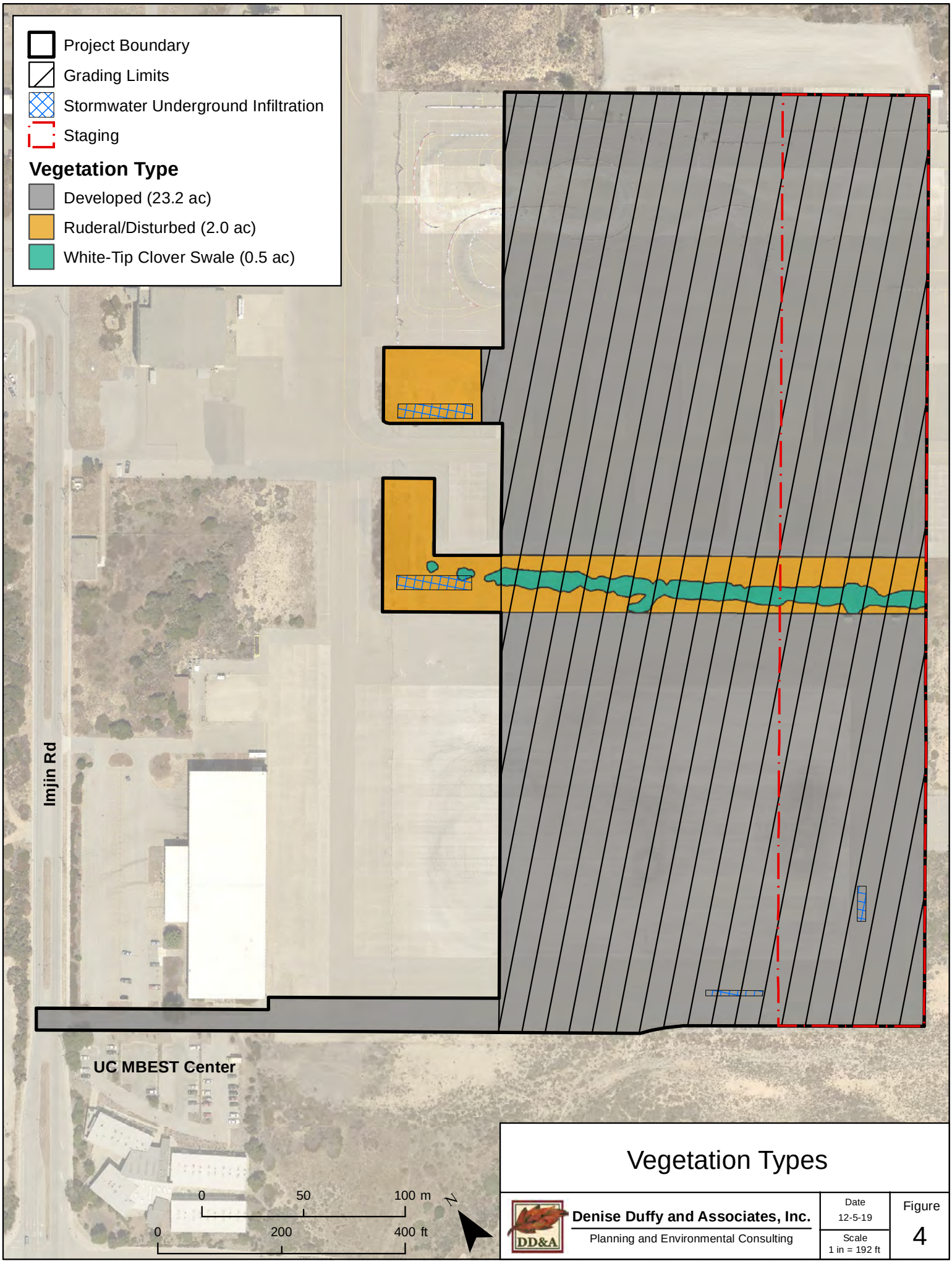
In addition, several special-status plant species, including Monterey spineflower, sandmat manzanita (*Arctostaphylos pumila*), and sand gilia (*Gilia tenuiflora* ssp. *arenaria*) were identified directly adjacent to the project site during 2019 botanical surveys.[7] Suitable habitat for other special-status plants, such as seaside bird's-beak (*Cordylanthus rigidus* ssp. *littoralis*), marsh microseris (*Microseris paludosa*), curly-leaved monardella (*Mondardella undulata*), and Yadon's piperia (*Piperia yadonii*), is also present directly adjacent to the project site; however, surveys were not conducted during the appropriate blooming period for these species within adjacent areas.

Fort Ord Habitat Management Plan and Habitat Conservation Plan

The project site is located within a Fort Ord HMP parcel designated as "development" (Parcel L5.1). Through implementation of the Fort Ord HMP, impacts to HMP species and habitats occurring within the designated development parcel were anticipated and mitigated through the establishment of habitat reserves and corridors and the implementation of habitat management requirements within habitat reserve parcels on the former Fort Ord. Parcels designated as "development" have no management restrictions; however, the 2017 Programmatic BO and Fort Ord HMP require the identification of sensitive botanical resources within these parcels that may be salvaged for use in restoration activities in reserve areas.

[6] Status Definitions: CSC: California Species of Concern; WL: CDFW Watch List; FT: Federally Threatened; 1B: California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) 1B Species (rare, threatened, or endangered in California and elsewhere); HMP: Fort Ord Habitat Management Plan Species.

[7] Spring botanical surveys were conducted within a larger area than the project site described in this document. Summer surveys were conducted only within the project site.

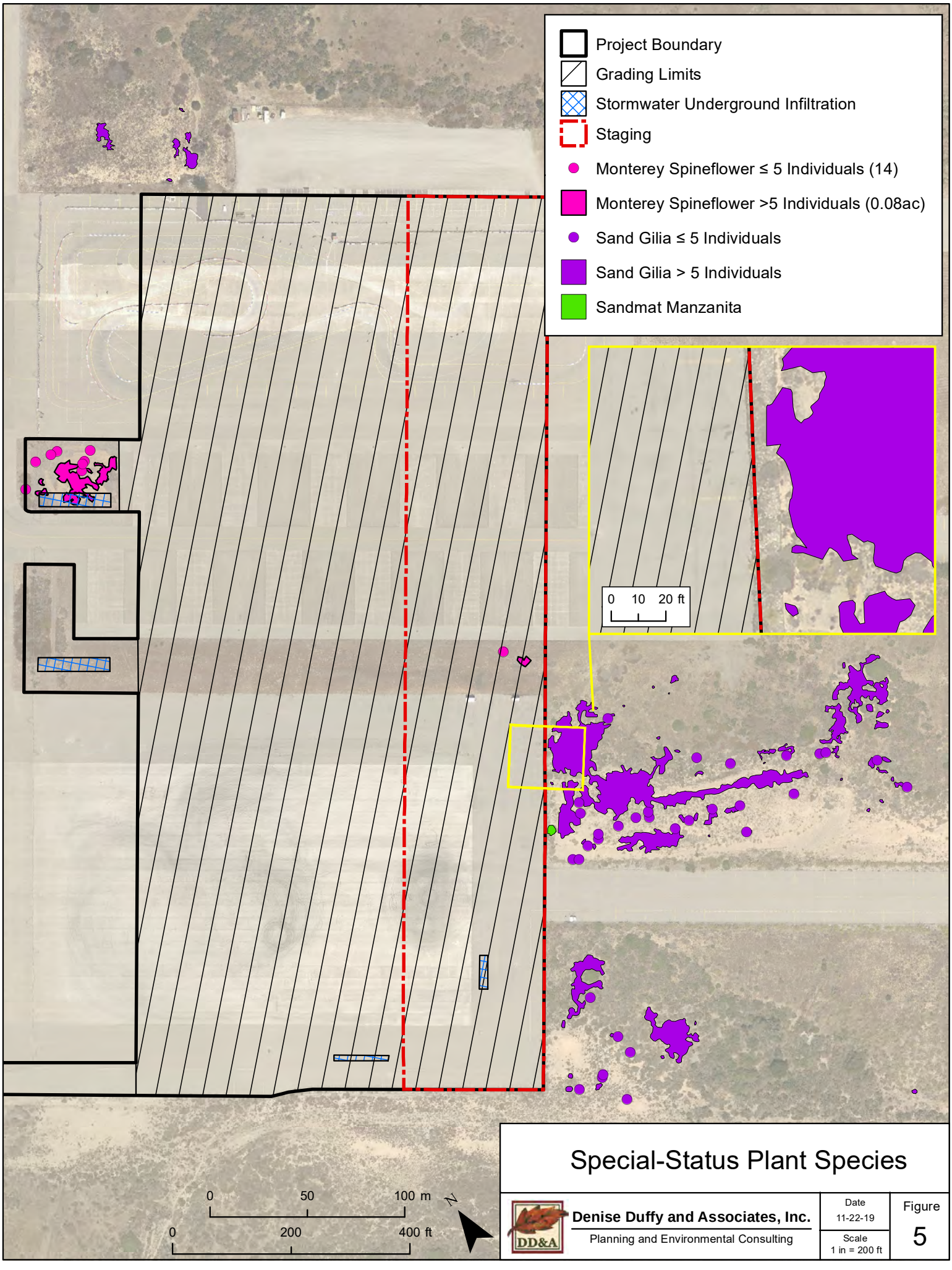


Vegetation Types

Denise Duffy and Associates, Inc.
Planning and Environmental Consulting

Date: 12-5-19
Scale: 1 in = 192 ft
Figure: 4

Path: C:\GIS\GIS_Projects\2019-16 Marina Airport\Final Products\CEQA\Fig 4 - Vegetation Types.mxd



Special-Status Plant Species

Denise Duffy and Associates, Inc.
Planning and Environmental Consulting

Date: 11-22-19
Scale: 1 in = 200 ft
Figure: 5

Path: C:\GIS\GIS_Projects\2019-16 Marina Airport\Final Products\CEQA\Fig 5 - Rare Plants.mxd

The Fort Ord HMP does not, however, provide specific authorization for incidental take of federal or state listed species to existing or future non-federal land recipients under the ESA or the CESA. In compliance with the ESA and CESA, FORA is currently in the process of obtaining a Section 10(a)(1)(B) Incidental Take Permit from the USFWS and Section 2081 Incidental Take Permit from CDFW, which will provide base-wide coverage for the take of federal and state listed wildlife and plant species to all non-federal entities receiving land on the former Fort Ord. This process involves the preparation of an HCP. The Draft Fort Ord HCP (ICF International, Inc., 2017) is currently in draft form and being reviewed by the resource agencies. The base-wide incidental take permits are expected to be issued by the USFWS and CDFW by the end of 2019.

Please refer to the Biological Resources Report in **Appendix C** and the discussion of existing environmental studies and plans in *Section II.C Background* above for additional information on the Fort Ord HMP and the Draft Fort Ord HCP.

Discussion/Mitigation

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? ***Less Than Significant Impact with Mitigation Incorporated.***

HMP Special-Status Species

One HMP annual plant species, Monterey spineflower, is known to occur within the project site. Implementation of the project would result in take of this species (approximately 0.08 ac and 14 individuals) and loss of habitat for this species. Additionally, one HMP wildlife species, northern California legless lizard, has a high potential to occur within the undeveloped areas of the project site. With the designated habitat reserves and corridors and habitat management requirements of the HMP in place, the loss of these species is not expected to jeopardize the long-term viability of these species and their populations on the former Fort Ord. This is such because the recipients of disposed land with restrictions or management guidelines designated by the Fort Ord HMP will be obligated to implement those specific measures through the Fort Ord HMP and deed covenants. The project is:

1. Located within a designated "development" parcel;
2. Required to comply with the habitat management restrictions identified in the HMP; and
3. Would not result in any additional impacts to HMP species and habitats beyond those anticipated in the Fort Ord HMP.

Joby is required to implement Fort Ord HMP requirements in accordance with the deed covenants, which apply to the project parcel. Implementation of **Mitigation Measure BIO-1** will ensure compliance with the Fort Ord HMP. Therefore, impacts to Monterey spineflower and northern California legless are less than significant.

Two additional HMP species, sandmat manzanita and sand gilia, are known to occur directly adjacent to the project site. In addition, suitable habitat for other HMP plant species, including seaside bird's-beak, is present directly adjacent to the project site in areas where summer surveys were not conducted in 2019. Impacts to sandmat manzanita resulting from the project would be considered less-than-significant; however, as described above, Joby would be required to implement Fort Ord HMP requirements. Implementation of **Mitigation Measure BIO-2** would avoid impacts to sandmat manzanita and avoid the need to implement Fort Ord HMP requirements for this species.

Although sand gilia and seaside bird's-beak are HMP species, the Fort Ord HMP does not exempt existing or future land recipients from the federal and state requirements of ESA and CESA and impacts

to these species would be considered a significant impact. If there is the potential for incidental take of a state listed plant or wildlife species, take of the listed species can be authorized through the incidental take permit process. Therefore, if the project would result in impacts to sand gilia or seaside bird's-beak, Joby would be required to comply with CESA by retaining a 2081 incidental take permit from CDFW or by waiting to begin construction until the Fort Ord HCP is approved. Implementation of **Mitigation Measure BIO-2** will ensure that state-listed HMP species known or with the potential to occur directly adjacent to the project site will be avoided and the impact reduced to less than significant.

Mitigation Measures BIO-3, BIO-4, and **BIO-6** will reduce potentially significant impacts to non-HMP special-status species; however, HMP special-status species would also benefit from the implementation of these measures. These measures would reduce construction-related impacts through a combination of protective measures during construction, education, monitoring, and invasive species controls. Please see the "Non-HMP Special-Status Species" discussion below for details regarding these measures.

Non-HMP Special-Status Species

Suitable habitat for two non-HMP special-status species is present within the project site. The non-HMP species that are known or have a moderate to high potential to occur within and be impacted by the project include coast horned lizard and California horned lark. Project implementation could result in direct impacts to individuals and loss of habitat for these species. Construction-related activities (e.g., removal of vegetation, equipment noise, vibration) could also result in California horned lark nest abandonment. These are potentially significant impacts. Implementation of **Mitigation Measures BIO-3** through **BIO-6**, which avoid and minimize impacts through implementing construction BMPs, pre-construction surveys, monitoring, and invasive species controls, would reduce potentially significant impacts to these species to a less than significant level.

Special-Status Species Habitat

Implementation of the project would result in impacts to approximately 2.5 acres of low quality habitat for special-status species (i.e., the undeveloped areas of the project site). However, the Fort Ord HMP establishes guidelines for the conservation and management of species and habitats on former Fort Ord lands by identifying lands that are available for development, lands that have some restrictions with development, and habitat reserve areas. The intent of the plan is to establish large, contiguous habitat conservation areas and wildlife corridors to compensate for future development in other areas of the former base. The Fort Ord HMP sets the standards to assure the long-term viability of former Fort Ord's biological resources in the context of base reuse so that no further mitigation should be necessary for impacts to species and habitats considered in the Fort Ord HMP. This plan has been approved by the USFWS; the Fort Ord HMP, deed restrictions, and Memoranda of Agreement between the Army and various land recipients provide the legal mechanism to assure Fort Ord HMP implementation. It is a legally binding document, and all recipients of former Fort Ord lands are required to abide by its management requirements and procedures.

The project is located within a designated development parcel. Therefore, implementation of the project would not have a significant impact on special-status species habitat, particularly when taken into context with the over 18,500 acres of preserved habitat for special-status species within the former Fort Ord. This is a less than significant impact. No mitigation is required.

Mitigation

MM BIO-1: Monterey Spineflower Salvage

Prior to grading or construction on the site, seed shall be collected from Monterey spineflower plants occurring within the development site during the appropriate time of year, as determined by qualified biologists. The collected seeds shall be used to revegetate temporarily disturbed construction areas or reseeding and restoration efforts on- or off-site, as determined appropriate by the qualified biologists.

MM BIO-2: Adjacent Undeveloped Areas

Undeveloped areas adjacent to the tarmac shall be avoided due to the known presence of state-listed sand gilia and potential for other special-status plant species. Undeveloped areas adjacent to the tarmac shall be protected prior to and during construction to the maximum possible through the use of exclusionary fencing and/or flagging. A biological monitor will supervise the installation of protective fencing/flagging and monitor to ensure that the protective fencing/flagging remains intact, as described in Mitigation Measure BIO-3.

MM BIO-3: Construction-Phase Monitoring

Joby will retain a qualified biologist to monitor all ground disturbing construction activities (i.e., vegetation removal, grading, excavation, or similar activities) to protect any special-status species encountered. Any handling and relocation protocols of special-status wildlife species will be determined in coordination with CDFW prior to any ground disturbing activities, and will be conducted by a qualified biologist with appropriate scientific collection permit. After ground disturbing project activities are complete, the qualified biologist will train an individual from the construction crew to act as the on-site construction biological monitor. The construction biological monitor will be the contact for any special-status wildlife species encounters, will conduct daily inspections of equipment and materials stored on site and any holes or trenches prior to the commencement of work, and will ensure that all installed fencing stays in place throughout the construction period. The qualified biologist will then conduct regular scheduled and unscheduled visits to ensure the construction biological monitor is satisfactorily implementing all appropriate mitigation protocols. Both the qualified biologist and the construction biological monitor have the ability cease construction contractor work and/or redirect project activities to ensure protection of resources and compliance with all environmental conditions of the project.

MM BIO-4: Construction Best Management Practices

The following BMPs will be implemented during all identified phases of construction (i.e., pre-, during, and post-) to reduce impacts to special-status plant and wildlife species:

- A qualified biologist will conduct an Employee Education Program for the construction crew prior to any construction activities. The qualified biologist will meet with the construction crew at the onset of construction at the project site to educate the construction crew on the following: 1) the appropriate access route(s) in and out of the construction area and review project boundaries; 2) how a biological monitor will examine the area and agree upon a method which will ensure the safety of the monitor during such activities, 3) the special-status species that may be present; 4) the specific mitigation measures that will be incorporated into the construction effort; 5) the general provisions and protections afforded by CDFW; and 6) the proper procedures if a special-status species is encountered within the project site.
- Grading, excavating, and other activities that involve substantial soil disturbance will be planned and implemented in consultation with a qualified hydrologist, engineer, or erosion control specialist, and will utilize standard erosion control techniques to minimize erosion and

sedimentation to native vegetation adjacent to the project site (pre-, during, and post-construction).

- No firearms will be allowed on the project site at any time.
- All food-related and other trash will be disposed of in closed containers and removed from the project area at least once a week during the construction period, or more often if trash is attracting avian or mammalian predators. Construction personnel will not feed or otherwise attract wildlife to the area.

MM BIO-5: Pre-Construction Surveys for California Horned Lark

Construction activities that may directly (e.g., vegetation removal) or indirectly (e.g., noise/ground disturbance) affect California horned lark will be timed to avoid the breeding and nesting season. Specifically, vegetation removal can be scheduled after September 16 and before January 31. Alternatively, a qualified biologist will be retained by the project applicant to conduct pre-construction surveys for California horned lark nests within 300 feet of proposed construction activities if construction occurs between February 1 and September 15. Pre-construction surveys will be conducted no more than 14 days prior to the start of construction activities during the early part of the breeding season (February through April) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May through August).

If California horned lark nests are identified during the pre-construction surveys, the qualified biologist will notify the project applicant and an appropriate no-disturbance buffer will be imposed within which no construction activities or disturbance should take place (generally 300 feet in all directions) until the young of the year have fledged and are no longer reliant upon the nest or parental care for survival, as determined by a qualified biologist.

MM BIO-6: Non-Native, Invasive Species Controls

The following measures will be implemented to reduce the introduction and spread of non-native, invasive species:

- Any landscaping or replanting required for the project will not use species listed as noxious by the California Department of Food and Agriculture (CDFA) or invasive by the California Invasive Plant Council (Cal-IPC).
- Bare and disturbed soil will be landscaped with CDFA recommended seed mix or plantings from locally adopted species to preclude the invasion on noxious weeds in the project site.
- All non-native, invasive plant species will be removed from disturbed areas prior to replanting.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? ***No Impact.***

White-tip clover swale is listed as a sensitive natural community on the CDFW's *California Natural Communities List*. Approximately 0.5-acre of white-tip clover swale occurs within the project site and would be permanently impacted by the project. This is a potentially significant impact. Implementation of **Mitigation Measure BIO-7**, which mitigates for impacts through soil preservation and placement within the detention basin following construction, would reduce potentially significant impacts to this sensitive habitat to a less than significant level.

MM BIO-7: White-Tip Clover Swale Soil Preservation

The top two to three inches of topsoil within the white-tip clover swale area shall be collected and reserved on-site. The reserved soil shall be placed on top of an impermeable surface, such as a

tarp, and shall be covered to prevent wind erosion or spread of invasive weeds into the stockpile. Following construction, reserved topsoil shall be placed in the detention basin over an area no less than 0.5 acre (1:1).

c) *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?* ***No Impact.***

A wetland delineation was conducted and no state or federally protected wetlands were identified within or adjacent to the site. Therefore, the project will not result in impacts to state or federally protected wetlands.

d) *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?* ***Less Than Significant Impact.***

The project site is located within the Airport property which is enclosed by security fencing that serves the dual purpose of preventing people and large wildlife species, such as deer, from entering the airport for safety reasons. As such, the project site is not within an area that is used as a corridor for large wildlife species. Small wildlife species that are able to pass over or through the fencing, such as birds, rodents, and reptiles, may utilize the undeveloped areas as habitat while moving through the site. However, the project site is mostly in developed with only small areas of vegetation and provides very little habitat value to wildlife. The implementation of the project would involve impacts to these vegetation communities; however, the project would impact only a very small percentage of wildlife habitat within the former Fort Ord. The Fort Ord HMP preserves approximately 18,500 acres of large, contiguous areas of wildlife habitat that will remain on the former Fort Ord and will be preserved in perpetuity. The Fort Ord HMP considered conservation area connectivity as an essential component of the design of the conservation areas and corridors within the former Fort Ord. The Fort Ord HMP created conservation areas and corridors with the purpose of linking the plant and animal populations in the northern portion of the former base at the Airport to the populations in the south to the Fort Ord National Monument and the El Toro Creek undercrossing of Highway 68. Therefore, the development of the project, would not disconnect, fragment, or otherwise impeded wildlife movement in the primary, significant wildlife movement corridors between the former Fort Ord lands and other lands. This is a less-than-significant impact. No mitigation is required.

e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?* ***Less Than Significant Impact with Mitigation***.

No trees are present within the project site and the project will not conflict with a tree preservation policy or ordinance. However, the Project would be required to comply with all applicable guidelines in the Fort Ord HMP. Implementation of **Mitigation Measure BIO-1** will ensure compliance with the Fort Ord HMP and reduce this impact to a less than significant level.

f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?* ***Less Than Significant Impact with Mitigation.***

The project site is not located within an approved HCP or Natural Community Conservation Planning area. However, it is located within the Fort Ord HMP boundaries and the plan area associated with the Draft Fort Ord HCP. The project site is designated for development (with no restrictions) in the Fort Ord HMP and is located within a designated development area in the Draft Fort Ord HCP. The Project would be required to comply with all applicable guidelines in the Fort Ord HMP. Implementation of

Mitigation Measure BIO-1 will ensure compliance with the Fort Ord HMP and reduce this impact to a less than significant level.

Conclusion

The project would have a less-than-significant impact on biological resources with implementation of applicable mitigation measures included in the Fort Ord HMP and the mitigation identified above.

5. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5? (Source: 14, 40)	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? (Source: 14, 40)	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries? (Source: 14, 40)	☐	☐	☒	☐

Setting

Cultural resources are defined as buildings, sites, structures, or objects, each of which may have historical, architectural, archaeological, or cultural importance. Significant cultural resources may be historical resources (i.e., cultural resources eligible for inclusion on the California Register of Historical Resources [CRHR]) or unique archaeological resource as defined in CEQA. Cultural resources encompass archaeological and historic resources as briefly summarized below:

- **Archaeological Resources:** Archaeology is the study of prehistoric human activities and cultures. Archaeological resources are associated with indigenous cultures and historic-era settlement and are less than 10,000 years old.
- **Historic Resources:** Historic resources (extant buildings and structures) are associated with the more recent past. In California, historic resources are typically associated with the Spanish, Mexican, and American periods in the state's history and are usually less than 200 years old.
- **Tribal Cultural Resources:** Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the CRHR or local register of historical resources (PRC §21074).

A Cultural Resources Constraints Analysis was prepared for the Airport Master Plan Update area (which includes the project site) by SWCA Environmental Consultants (SWCA) in October 2016 to determine if significant cultural resources could be affected implementation of the Airport Master Plan, as defined by CEQA. The review effort included a records search, a literature review and initial Native American coordination. SWCA received the results of the cultural resources records search data from the Northwest Information Center (NWIC), located at Sonoma State University, Rohnert Park, on July 18, 2016. The Native American Heritage Commission (NAHC) was contacted on April 26, 2016, requesting a search of their sacred lands file (SLF); a response was received on April 27, 2016.

The NWIC records search data revealed that 16 cultural resources studies have been conducted within a 0.25-mile radius of the Airport, 12 of which included at least a portion of the Airport. Three previously identified cultural resources are located within the Airport and a 0.25-mile radius; however, none of these resources are present within the project site. Additionally, there are potential historic-era resources associated with the former Fort Ord and the Airport that may have "come of age" in recent years (i.e., are now greater than 45 years of age) and were not addressed by past studies. A historic map review revealed that at least nine unevaluated buildings within the Airport were constructed between 1963 and 1968 and,

therefore, may be considered as historic properties or historical resources. These buildings are located adjacent to the project site; however, no buildings are present within the project site.

Please refer to *Section VI.18 Tribal Cultural Resources* for a discussion and evaluation of tribal resources and consultation.

Discussion/Mitigation

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5? ***No Impact.***

No listed or known potential National Register of Historic Places and/or CRHR are located within the project site. No other significant or potentially significant local, state or federal cultural resources/historic properties, landmarks, points of interest, etc. have been identified within the project site. Therefore, no impacts would result to historical resources as defined in CEQA 15064.5.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? ***Less Than Significant Impact.***

c) Would the project disturb any human remains, including those interred outside of formal cemeteries? ***Less Than Significant Impact.***

The Cultural Resources Constraints Analysis found no archaeologically, historically, or architecturally significant sites, structures, landmarks, or points of interest within the project site. As identified above, at least nine unevaluated buildings within the Airport were constructed between 1963 and 1968 and may be considered as historic properties or historical resources. These buildings are located adjacent to the project site; however, no buildings are present within the project site and the adjacent buildings would not be impacted by the project.

No known archaeological resources or human remains have been documented in the project site. However, there is the possibility of inadvertently uncovering unknown archaeological resources and/or human remains during construction. The potential inadvertent discovery of archaeological resources and/or human remains and potential inadvertent damage or disturbance during construction is considered a potentially significant impact.

Mitigation measure CR/mm-1 in the Airport Master Plan IS/MND recommends a records search and preparation of a cultural resources assessment and technical report be prepared for future projects within the Airport, as recommended in the Cultural Resources Constraints Analysis. However, because significant grading and ground disturbance to a depth of approximately three feet were required for installation of the existing tarmac and the project would not expose or disturb any native soils that were not previously disturbed, it is highly likely that any historical or cultural resources present would have been discovered during previous groundwork. Therefore, based on the reasons described above, the evaluation conducted for the Airport Master Plan sufficiently evaluates the project site and a project-specific assessment is not necessary.

Mitigation measure CR/mm-1 in the Airport Master Plan IS/MND also includes measures for previously undiscovered archeological resources and/or human remains. Therefore, because the project would comply with the Airport Master Plan and implement applicable portions mitigation measure CR/mm-1, this is a less than significant impact.

Conclusion

The project would have a less-than-significant impact on cultural resources with implementation of applicable mitigation measures included in the Airport Master Plan IS/MND.

6. ENERGY **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Source: 1, 3, 29)	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (Source: 11)	☐	☐	☒	☐

Setting

The project site lies within the service area of MBCP, a locally-controlled public agency providing carbon-free electricity to residents and businesses. Formed in February 2017, MBCP is a joint powers authority, and is based on a local energy model called community choice energy. MBCP's standard electricity offering is carbon free and 30 percent renewable. MBCP partners with PG&E, which continues to provide billing, power transmission and distribution, customer service, grid maintenance services, and natural gas services to Monterey County (MBCP, 2019).

A natural gas line would tie the manufacturing building into existing PG&E infrastructure within Imjin Road. Power lines would be underground and would connect to existing overhead electricity lines on Imjin Road.

Discussion/Mitigation

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? ***Less Than Significant Impact.***

Construction

The project would require site preparation, grading, trenching, building construction, paving, and architectural coating over the entire 15 month construction period. Energy would be required for preparation of the site (e.g. excavation and grading), manufacture and transportation of building materials, and the actual construction of the manufacturing facility and other project components. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks.

The construction energy use has not been determined at this time. However, the project would not cause inefficient, wasteful, or unnecessary consumption of energy as the construction schedule and process is already designed to be efficient in order to avoid excess monetary costs. Equipment and fuel are not typically used wastefully during construction due to the added expenses associated with renting, maintaining, and fueling the equipment. Hand tools would be used when possible in order to avoid use of heavy machinery. Furthermore, energy use required to complete construction would be limited and short-term. The impacts from the use of fuels and building materials during construction are unavoidable because they are fundamental to the construction of new buildings. However, with implementation of air quality-related BMPs (see *Section VI.3 Air Quality*) the energy impacts of construction would be less than significant.

Operational

Operation of the manufacturing facility would annually consume approximately 4,790,800 kilowatt hours (kWh) of electricity and 14,728,800 kilo-British thermal units (kBtu) of natural gas based on CalEEMod model outputs for energy source. Energy would be used primarily for building heating, cooling, and lighting, material conveyance, and the production and testing of VTOL aircraft. The energy use is likely overstated, however, because the project would be built to the 2016 California Building Code standards and Title 24 energy efficiency standards (or subsequently adopted standards during the two-year construction term) and California Green Building Standards Code (CalGreen Code), which includes insulation and design provisions to minimize wasteful energy consumption.

Operation of the facility would also result in an increase in approximately 5,130,749 annual VMT, based on CalEEMod model outputs. Using the EPA's estimated average fuel economy of 23.2 miles per gallon, operation of the project would result in the consumption of approximately 221,153 gallons of gasoline per year[8]. It is also important to note, that new automobiles would be subject to fuel economy and efficiency standards applied throughout the state. As such, the fuel efficiency of vehicles associated with the project would increase throughout the life of the project and thus the gasoline consumption will likely decrease over time. Furthermore, the project would encourage the use of electric vehicles by providing approximately 10 percent of all on-site parking spaces with charging stations. In addition, a structured carpool and shuttle service would be provided to employees with the anticipation that 20 percent of total staff would be commuting in this manner. On-site bike storage would also be provided to encourage bicycle commuting.

Based on the discussion above, construction and operation of the project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?* ***Less Than Significant Impact.***

The construction and operation of the project would have a less than significant impact due to energy usage and efficiency and, thus, would not conflict with local or state plans for energy efficiency. The project would be required to comply with the California Building Code and CalGreen Code pertaining to energy and water conservation standards in effect at the time of construction. In addition, the purpose of the manufacturing facility is to produce light-weight, all-electric aircraft, which are consistent with and desirable under plans for energy efficiency. Therefore, the project would have a less than significant impact on state or local plans for renewable energy or energy efficiency.

Conclusion

The project would have a less than significant impact on energy.

[8] 5,130,749 annual VMT/23.2 mpg = 221,153 gallons of gasoline per year

7. GEOLOGY AND SOILS **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (Source: 14, 39)	☐	☐	☐	☒
ii) Strong seismic ground shaking? (Source: 11, 14, 39)	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction? (Source: 11, 13, 14, 39)	☐	☐	☒	☐
iv) Landslides? (Source: 14)	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil? (Source: 11, 14, 39)	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (Source: 39)	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? (Source: 39)	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (Source: 1)	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Source: 14, 40)	☐	☐	☐	☒

Setting

Soils at the project site are disturbed associated with the historic construction of the tarmac and ongoing Airport operations and maintenance within the undeveloped areas. The approximate elevation of the project site is 140 feet above mean sea level. The Monterey County Soil Survey indicates several mapping units within the project area, including:

- Baywood Sand, 2-15% Slopes (BbC): This soil unit consists of gently sloping to rolling soils that formed on stabilized sand dunes. This soils unit is somewhat excessively drained, runoff is slow to medium, and the erosion hazard is slight to moderate.
- Oceano Loamy Sand, 2-15% Slopes (OaD): This soil unit is part of the Oceano series, which consists of excessively drained soils that formed in eolian sands and old stabilized dunes. Runoff is slow to medium for this soil unit and the erosion hazard is slight to medium (NRCS, 1978).

A Geotechnical Investigation Report prepared for an immediately-adjacent, previously-approved project was reviewed and extrapolated from for the analysis of the proposed project included in this section (Geotech Report; Soil Surveys Group, Inc., 2019; **Appendix D**). The adjacent approved project is located on the same tarmac as the proposed project and the soil conditions are assumed to be the same for both areas. The project site is located within a seismically-active area. The Geotech Report identifies eight nearby faults that could produce an earthquake that could impact the project site. The nearest faults, Rinconada and Reliz, are within one mile of the project site. No major earthquakes have occurred on these faults during the past 100 years (ICF Jones & Stokes, 2008). The largest earthquake fault in the region is the San Andreas, a major active fault located approximately 16 miles northeast of the project site. Geotechnical maps included in the City's General Plan identify that the seismic shaking hazard at the project site is moderate (City, 2010a). The project site is not located in an Alquist-Priolo Earthquake Fault Zone.

The Geotech Report also indicates that the potential risk for occurrence of damaging liquefaction or lateral spreading at the project site would be low during a strong seismic event due to deeper dense sand soils beneath the project site and the absence of shallow groundwater. Additionally, the Geotech Report indicates that the potential for surface rupture or lurch cracking is considered to be low at the project site as no known faults have been mapped through the project site.

Discussion/Mitigation

ai) Would the project directly or indirectly cause to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? ***No Impact.***

The site is not located within a State of California Earthquake Fault Hazard Zone and no known active faults cross the site. The project site is not mapped within an Alquist-Priolo Earthquake Fault Zone. Therefore, no impact would occur.

aii) Would the project directly or indirectly cause to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking? ***Less Than Significant Impact.***

Although the project is not located within a State of California Earthquake Fault Hazard Zone and no known active faults cross the site, the project is located in a seismically active region. Furthermore, the project would be constructed to standard engineering and seismic safety design techniques. The project would be designed and constructed in accordance with all state, federal, and other laws, rules, regulations to avoid or minimize potential direct or indirect damage from seismic ground shaking. Additionally, as required for issuance of the grading permit, recommendations to minimize potential geotechnical hazards provided in the Geotech Report would be incorporated into the project design (**Appendix D**). Application of these measures would reduce any potentially significant geotechnical impacts to a less-than-significant level.

aiii) Would the project directly or indirectly cause to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction? ***Less Than Significant Impact.***

The project site is located in an area of low liquefaction potential. As described above, the project site may be subject to strong ground shaking in the event of a major earthquake and would be required to incorporate the recommendations provided in the geotechnical evaluation as required by the City grading permit. The project would be designed and constructed in accordance with all state, federal, and other laws, rules, regulations to avoid or minimize potential direct or indirect damage from seismic related ground failure, including liquefaction. This is considered a less-than-significant impact.

aiv) Would the project directly or indirectly cause to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides*? **Less Than Significant Impact.***

Landslide potential is minimal as the project site is flat with less than 15 percent slopes Therefore, impacts related to landslides are less than significant. See also aiii) above.

*b) Would the project result in substantial soil erosion or the loss of topsoil? **Less Than Significant Impact.***

Geotechnical maps included in the City's General Plan identify that erosion potential at the project site is low. Further, the Geotech Report indicates that the near-surface soils within the project site have the potential to erode, especially if protective vegetation and concrete is removed. Development of the project site would require grading of approximately 28,500 CY of fill and 28,500 CY of cut, which could result in a temporary increase in erosion. As described in aiii) above, the project would be required to obtain a grading permit from the City, which would require submittal of an erosion control plan and drainage plan prior to issuance of a grading permit.

Furthermore, the project would also be subject to the requirements of the NPDES Industrial General Permit, which includes the preparation of a SWPPP, as outlined in *Section VI.10 Hydrology and Water Quality* for construction activities disturbing one acre or more. Any temporary erosion related to construction would be minimized through the implementation of standard construction phase BMPs related to erosion. Erosion control measures and associated BMPs would be consistent with the recommended measures contained in the California Stormwater Best Management Practices Handbooks. Applicable measures may include the following:

- Stockpiling and disposing of demolition debris, concrete, and soil.
- Protecting existing storm drain inlets and stabilizing disturbed areas.
- Hydroseeding/re-vegetating disturbed areas.
- Minimizing areas of impervious surfaces.
- Implementing runoff controls (e.g., percolation basins and drainage facilities).
- Properly managing construction materials.
- Managing waste, aggressively controlling litter, and implementing sediment controls.
- Limiting grading to the minimum area necessary for construction and operation of the project.

Compliance with City and state requirements, and the above BMPs would ensure that construction activities associated with the project would not cause substantial soil erosion under CEQA and potential erosion related impacts would be reduced to a less-than-significant level.

*c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? **No Impact.***

No unsuitable or unstable soils conditions were found at the boring locations evaluated in the Geotech Report (**Appendix D**). As such, the Geotech Report indicates that the project site is suitable for construction of the project.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? ***Less Than Significant Impact.***

The Geotech Report indicates loose and slightly expansive near-surface soils conditions within the project site, which could damage proposed structures on the site (**Appendix D**). Impacts associated with expansive soils or other soil hazards would be minimized by applying appropriate engineering and construction techniques, as identified in the Geotech Report. This would reduce any potentially significant geotechnical impacts to a less-than-significant level.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? ***No Impact****.*

The project does not propose any septic tanks or alternative wastewater disposal system.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ***No Impact****.*

To date, only one prehistoric site is known to have potentially occurred on the Airport. Prehistoric Site P-27-395 was noted in 1950 as having been destroyed in 1940. Its exact location within the former Fort Ord is unknown; therefore, it is not certain whether it was located on the Airport. However, because it is no longer intact, the project would not impact any paleontological resources.

Conclusion

The project would have a less-than-significant impact on geology and soils with implementation of BMPs and identified standard permit conditions.

8. GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Source: 3, 29, 33)	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Source: 11)	☐	☐	☒	☐

Setting

Various gases in the earth's atmosphere, when naturally occurring or 'background' levels due to human activity, create a warming or greenhouse effect, and are classified as atmospheric GHGs. These gases play a critical role in determining the earth's surface temperature. Solar radiation enters the atmosphere from space and a portion of the radiation is absorbed by the earth's surface. The earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, the radiation that otherwise would have escaped back into space is retained, resulting in a warming of the atmosphere known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect, or climate change, are carbon dioxide (CO_2), methane (CH_4), O_3, water vapor, nitrous oxide (N_2O), and chlorofluorocarbons (CFCs). Human-caused emissions of these GHGs in excess of natural ambient concentrations are responsible for the greenhouse effect. In California, the transportation sector is the largest emitter of GHGs.

Discussion/Mitigation

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ***Less than Significant Impact.***

The project is located in the NCCAB, where air quality is regulated by MBARD. Neither the State, MBARD, nor the City have adopted GHG emissions thresholds or a GHG emissions reduction plan that would apply to the project. However, it is important to note, that other air districts within the State of California have recently adopted recommended CEQA significance thresholds for GHG emissions. MBARD recommends using either the Bay Area Air Quality Management District (BAAQMD) or San Luis Obispo Air Pollution Control District (SLOAPCD) approved thresholds of significance for the evaluation of project-related increases of GHG emissions. The BAAQMD's CEQA Air Quality Guidelines recommended a GHG threshold of 10,000 metric tons per year (MT/yr) of carbon dioxide equivalent (CO_2e) for stationary-source projects. The BAAQMD defines stationary-source projects as projects that include land uses that would accommodate processes and equipment that emit GHG emissions and would require an Air District permit to operate. As discussed in *Section VI.3, Air Quality* above, the project will require an Authority to Construct (ATC) and Permit to Operate, as a result the project would meet the BAAQMD definition of a stationary source.

Development projects located within these jurisdictions that would exceed these thresholds would be considered to have a potentially significant impact on the environment which could conflict with applicable GHG-reduction plans, policies and regulations. Projects with GHG emissions that do not exceed the applicable threshold would be considered to have a less-than-significant impact on the

environment. Given that the MBARD has not yet adopted recommended GHG significance thresholds, the above threshold for stationary source projects was relied upon for evaluation of the project.

Construction and operational GHG emissions for the project were modeled using CalEEMod (**Appendix B**). Unless otherwise noted, model inputs are based upon the information provided by Joby regarding proposed construction and operational activities. Data inputs for the project model are based on the following primary assumptions:

- The assumed operational date for the project is 2021.
- The model's default CO_2 intensity factor of 641 pounds/megawatt hour was reduced to 290 pounds/megawatt hour to reflect PG&E energy projections for 2020, the last year which such projections have been made. The intensity factor has been falling, in significant part due to the increasing percentage of PG&E's energy portfolio obtained from renewable energy.
- Emissions generated by the project are assumed to be similar to the CalEEMod default land use subtype "Manufacturing," which is defined as areas where the primary activity is the conversion of raw materials or parts into finished products. Manufacturing facilities generally also have office, warehouse, and research and development functions.
- Project emissions are based on the "Mitigated" CalEEMod outputs in order to incorporate the 2019 Title 24 standards, high efficiency outdoor lighting, construction BMPs, water conservation strategies (use of reclaimed water, installation of low flow fixtures, etc.), and the 75 percent waste diversion consistent with state standards (Assembly Bill 341) even though compliance with these standards would not be considered actual mitigation.

Construction Emissions

GHG emissions associated with construction were computed to be 1,177.35 MT/year of CO_2e. These emissions are generated by on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. Neither the City nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions, although the BAAQMD recommends quantifying emissions and disclosing GHG construction emissions. The BAAQMD also encourages the incorporation of BMPs to reduce GHG emissions during construction where feasible and applicable. BMPs that should be incorporated into construction of the project include, but are not limited to, using local building materials of at least 10 percent and recycling or reusing at least 50 percent of construction waste or demolition materials. Further any impacts from GHG generation during construction would be short-term and temporary. As a result, construction of the project is not anticipated to generate greenhouse gas emissions that may have a significant impact on the environment. This impact would be less than significant.

Operational Emissions

As shown in **Table 8-1**, annual emissions resulting from operation of the project are predicted to be 3,877.560 MT of CO_2e/year, which are below the BAAQMD threshold for stationary source emissions and thus are considered a less-than-significant impact. Further, these GHG emission are likely overstated since the project includes a number of traffic reduction measures. For instance, the project is required to have at least 904 parking spaces for staff and delivery trucks, however the project proposes a reduction of 277 spaces which would result in a reduction in vehicle miles travels and as a result a reduction in GHG emissions. The project includes the manufacturing of electric air taxies, which have significantly reduced GHG emissions, jet fuel is one of the largest emitters of GHGs, by replacing the avian fleet with electric air taxis the project would result in carbon offsets for GHG emissions. As a result, operation of the project is considered to have a less-than-significant impact related to GHG emissions.

Table 8-1. Annual Project GHG Emissions (CO_2e) in Metric Tons

Source Category	Proposed Project
Area	0.030
Energy Consumption	1,299.295
Mobile	2,388.81
Off-road Equipment	3.401
Solid Waste Generation	180.843
Water Usage	5.179
Total (MT CO_{2e}/yr)	**3,877.560**
Significance Threshold	*10,000*
Significant (Exceeds thresholds)?	**No**

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? ***Less than Significant Impact****.*

As previously stated, the project is located in the NCCAB, where air quality is regulated by MBARD. Neither the State, MBARD, nor the City have adopted GHG emissions thresholds or a GHG emissions reduction plan that would apply to the project. But as shown above, the project would not exceed acceptable thresholds. Also, consistent with the City's General Plan Goals and Policies, the project would include energy and water-efficient appliances, fixtures, lighting, and windows that meet applicable State energy performance standards. The project would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases as described above. This represents a less-than-significant impact.

Conclusion

The project would have a less-than-significant impact on greenhouse gas emissions with implementation of BMPs.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Source: 13, 14)	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Source: 13, 14)	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Source: 13, 14)	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Source: 13, 14, 21, 42, 4)	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (Source: 13, 14, 21)	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Source: 11, 13, 14)	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Source: 7, 11, 13, 14)	☐	☐	☒	☐

Setting

Hazardous materials are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. A hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. Hazardous materials and waste can result in public health hazards if improperly handled, released into the soil or groundwater, or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer. Hazardous materials transport, use, and disposal is heavily regulated at the federal, state, and local levels. These regulations are applied on a project-specific basis as part of the permitting process.

The City's General Plan Policy 4.103. - Public Safety, requires discretionary review and approval from the City if a project would involve handling of significant amounts of hazardous materials and/or would generate more than 27 gallons of hazardous wastes monthly (the limitation imposed by Monterey Regional Waste Management District for non-household hazardous wastes). The project would be below the thresholds requiring discretionary approval. Additionally, this policy requires the City to ensure that proposed industrial or commercial projects that will use or generate hazardous materials be compatible with surrounding uses as designated by the General Plan and that residential and other sensitive uses, such as schools, be adequately buffered from adjoining uses that involve the use or generation of hazardous materials.

The former Fort Ord was listed as a Federal National Priority List (NPL) site (also known as Superfund) in February 1990. The project site is located within U.S. Army parcel number L1.5, which was transferred to the City. The Environmental Baseline Survey for the Airport identified several hazardous and toxic waste sites at the Airport, including within the project parcel; however, none of these were located within the project site. Additionally, the FOST identified that groundwater underlying portions of the former Fort Ord are contaminated by volatile organic compounds (VOCs), primarily trichloroethene (TCE) as a result of base activities. Organic contaminants, most commonly TCE, formed a groundwater plume in the various aquifers underlying the former Fort Ord near the former landfill. Efforts are currently being undertaken by the U.S. Army to address groundwater contamination. However, no groundwater plumes exist under the proposed project site and groundwater contamination on the former Fort Ord would not affect the proposed project. All potable water would be from existing municipal supplies, which are not affected by the TCE plume.

Discussion/Mitigation

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ***Less Than Significant Impact.***

Construction and operational activities would require the use of hazardous substances, such as paints, solvents, lubricants, coolants, resin, adhesives, additive manufacturing powder (titanium and aluminum alloys), fuel for machinery and equipment, and inert gas. However, no acutely hazardous materials would be generated or stored, and it is not anticipated that manufacturing operations will generate more than 27 gallons of hazardous waste per month, excluding universal wastes.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ***Less Than Significant Impact with Mitigation Incorporated****.*

Use of hazardous substances during construction or operation of the project, such as paints, solvents, lubricants, coolants, resin, adhesives, additive manufacturing powder (titanium and aluminum alloys), fuel for machinery and equipment, and inert gas, could result in the exposure of persons and/or the environment to an adverse environmental impact due to the accidental release of a hazardous material. Implementation of **Mitigation Measure HAZ-1** would reduce potential impacts resulting from accidental release of hazardous materials to less than significant.

Mitigation

MM HAZ-1: Spill Prevention and Control Plan

Prior to commencement of construction-related activities, Joby or the Contractor shall prepare a Spill Prevention and Control Plan that addresses potential impacts associated with hazardous material usage during construction and operation. Joby or the Contractor will be responsible for implementing the Spill Prevention and Control Plan on-site for the duration of construction, and all personnel working on the site would be notified of its location. The Spill Prevention and Control Plan shall, at a minimum, consist of the following:

- Identify applicable safety and clean-up procedures in the event of a spill.
- Designate construction staging areas where hazardous materials may be stored. All staging areas shall be located outside of sensitive biological areas. Staging areas shall be designed to contain runoff to prevent contaminants (e.g., oil, grease, fuel products, etc.) from draining towards receiving waters and sensitive areas.
- Identify appropriate emergency notification procedures and emergency contacts.
- Designated location where a spill kit shall be maintained on-site throughout the project.
- Identify dedicated storage areas where hazardous material may be stored and/or used during construction

c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?* ***Less Than Significant Impact with Mitigation Incorporated****.*

The project site is located adjacent to the UC MBEST Center. One of current tenants is the Learning for Life Charter School. This school was founded in 2001 and serves students in grades 7—12. Learning for Life Charter School has open enrollment for the Monterey, San Benito, and Santa Cruz school districts. A second Tennent is the Pine Hill School. Beginning in 1976, the Pine Hill School, which is a non-public school program, has delivered school-based special education services to students in grades 1-12. As detailed in *Section VI.3 Air Quality* and above, the project has the potential to produce hazardous emissions. In addition, as discussed above, hazardous materials will be handled on-site. While these activities will meet local, state and federal guidelines and regulations and mitigation has been proposed for any impacts that are potentially significant, having these two schools located within the defined buffer of one quarter mile triggers a potentially significant impact under CEQA. Implementation of **Mitigation Measure HAZ-2** will reduce this impact to a less than significant level.

Mitigation

MM HAZ -2: Consultation with School Districts

In compliance with CEQA Section 15186, the City, acting as the CEQA lead agency, will consult with the Monterey, San Benito, and Santa Cruz school districts regarding the potential impact of the project on the schools when circulating the negative declaration for review. In addition, the City will notify the affected school district of the project, in writing, not less than 30 days prior to approval of the negative declaration.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ***Less Than Significant Impact with Mitigation Incorporated****.*

The project is located on the former Fort Ord, which is included on a hazardous materials site compiled pursuant to Government Code Section 65962.5. The project site is identified on the grading district map as an area with the potential for MEC. Due to the sites historical use as part of a former military installation, construction activities within this area have the potential to encounter unexploded ordnance which, if not identified and properly handled, could cause injury or death to construction workers. This is a potentially significant impact that would be reduced to less than significant with implementation of **Mitigation Measures HAZ-3** and **HAZ-4**.

Mitigation

MM HAZ-3: MEC Safety Measures

In order to minimize potential health and safety risks due to the exposure to MEC, prior to the commencement of any ground disturbing activity proposed, Joby Aviation or the Contractor, will coordinate with the City to develop a safety program that specifies protocols relative to MEC in accordance with City, California Division of Occupational Health and Safety (Cal-OSHA), and Army regulations. In the event that MEC are uncovered during the course of construction and other site disturbing activities, all work will cease, and Joby Aviation or the Contractor will notify the appropriate authorities. Work will not commence until the ordnance has been removed from the site and the surrounding site soils have been sampled and remediated to acceptable levels if soil sampling reveals lead or other soil contamination has occurred due to the presence of munitions.

MM HAZ-4: MEC Safety Training

In order to minimize potential health and safety risks due to the exposure to MEC, all construction personnel will attend an Army sponsored MEC safety debriefing, prior to the any ground-disturbing activities. This briefing will identify the variety of MEC that is expected to exist on the former Fort Ord and the necessary actions to be taken if a suspicious item is discovered during the course of project construction.

With the incorporation of the above mitigation measures, as well as local, state, and federal regulations and agreements, impacts related to hazardous materials sites would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? ***Less Than Significant Impact.***

The project would comply with FAA design standards as defined in FAA's AC 150/5300-13A, Change 1, Airport Design. In addition, a land use analysis was prepared as part of the Airport Master Plan. This land use analysis provided the framework for updating the ALUCP to be consistent with the Airport Master Plan. This plan is required per California State Aeronautics Act (SAA) pursuant to Public Utilities Code (PUC), §21001 et seq. Adopted in 1967 to assist local agency land use compatibility efforts, the laws are intended to protect: "public health, safety, and welfare by encouraging orderly expansion of airports and the adoption of land use measures that minimizes exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses." The project site is outside of the 20-year long-range noise exposure contours for the Airport and therefore the project is compatible with the Community Noise Equivalent Level (CNEL) of the Airport. Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the project area. This is a less-than-

significant impact and no mitigation is required. Please refer to *Section VI.13 Noise* for additional information.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ***Less Than Significant Impact.***

The Airport is part of the City's emergency response and evacuation plan. Mitigation Measure HAZ/mm-2 in the Airport Master Plan IS/MND requires the City to review this plan on an annual basis and update as necessary to account for additional development or changes in operations at the Airport. Therefore, the City's emergency response and evacuation plan would be updated as necessary to include the project and that project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This is a less-than-significant impact.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? ***Less Than Significant Impact****.*

The Airport is not located within a fire hazard severity zone, as mapped by the California Department of Forestry and Fire Protection (CAL FIRE), and no change to the Airport's risk to wildland fires would occur from the project. In addition, the Airport is part of the City's emergency response and evacuation plan. Mitigation Measure HAZ/mm-2 in the Airport Master Plan IS/MND requires the City to review this plan on an annual basis and update as necessary to account for additional development or changes in operations at the Airport. Therefore, the City's emergency response and evacuation plan would be updated as necessary to ensure that the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires (also see *Section VI.20 Wildfire*). This is a less-than-significant impact.

Conclusion

The project would have a less-than-significant impact related to hazards and hazardous materials with incorporation of the mitigation measures identified in the Airport Master Plan IS/MND and implementation of mitigation measures identified above.

10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? (Source: 1, 11, 14)	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (Source: 1, 11, 14)	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site? (Source: 1, 11, 14)	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (Source: 1, 11, 14)	☐	☐	☒	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? (Source: 1, 11, 14)	☐	☐	☒	☐
iv) Impede or redirect flood flows? (Source: 25)	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (Source: 10)	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (Source: 11, 14)	☐	☐	☒	☐

Setting

The project site is relatively flat area that consists mostly of concrete with small undeveloped areas. A shallow swale is located between two of the tarmacs within one of the undeveloped areas which collects localized runoff. Additional runoff from the project site flows onto adjacent undeveloped areas and into existing storm drainages within the tarmacs that discharge into the open areas immediately northeast of the project site (LSA Associates, Inc., 2017). The soils within and surrounding the project site consist mostly of sand and are somewhat excessively drained, as described in *Section VI.7 Geology and Soils.* There are no natural drainages of waterways within the site; however, the Salinas River is located approximately 0.4 mile from the site. The Flood Insurance Rate Maps issued by the Federal Emergency Management

Agency (FEMA) indicate that the project site is located within Zone X (Area of Minimal Flood Hazard), and is not within a designated FEMA 100-year floodplain (FEMA, 2019).

Consistent with the Airport Master Plan, storm drainage would be dispersed and percolated on site. The project includes the construction of a detention basin for stormwater treatment that would be designed according to the City's General Plan Policy 3.57 and FAA design standards, as set forth in *AC 150/5320-5D, Airport Drainage Design* and *AC 150/5200-33B, Hazardous Wildlife Attractants on or Near Airports*, which does not allow water to be detained on the Airport longer than 48 hours (City, 2010a; FAA, 2013; FAA, 2007).

The Central Coast Regional Water Quality Control Board (RWQCB) is the governing board for the region's stormwater discharges pursuant to the federal Clean Water Act, and the Airport operates under the City's NPDES General Industrial Permit. In accordance with the NPDES General Industrial Permit and mitigation measures included in the Airport Master Plan, a SWPPP will be required for construction of the project; however, because the manufacturing facility would retain its stormwater onsite per City stormwater standards, it would not be required to implement an operational SWPPP.

Discussion/Mitigation

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? ***Less Than Significant Impact.***

The project would not result in an increase in impervious surfaces. Approximately 1.5 acres of existing vegetation would be paved; however, 1.5 acres of existing paved areas would be converted to vegetated areas within the parking lot and detention basin. Project construction would require earth-moving activities, which has the potential result in erosion, siltation, and pollution during and after construction that could adversely affect water quality if there are any discharges to regulated waters; however, the Salinas River, the nearest regulated water, is located approximately 0.4 mile from the site and would not be impacted. Additionally, as described above, the project would comply with all applicable regulations to ensure proper discharge into the onsite detention basin, where stormwater would be disposed of via infiltration and evaporation. Infiltration would improve water quality and contribute to groundwater recharge. Per Mitigation Measure HYD/mm-3 from the Airport Master Plan IS/MND and the City's General Plan, the adequacy of the detention basin would be determined through preparation of storm drainage reports and plans, approved by the City Public Works Director. As such, impacts to surface and groundwater quality would be less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? ***Less Than Significant Impact.***

Water for project construction and operations would be provided by MCWD, which sources its water from the Salinas Valley Groundwater Basin (SVGB). At final buildout, the project is expected to use approximately 14.92 AFY of water, and MCWD has indicated that it can provide service to the project and would provide a "will serve" letter after the project is approved for construction. The irrigation system installed for landscaping would meet current water efficiency standards and native, drought-tolerant plants would be utilized in conformance with City landscaping requirements. Additionally, recycled water would be used for irrigation to the greatest extent feasible. In addition, the project would not create additional impervious surfaces, and all runoff from the project site would be designed to flow to the onsite detention basin, where it would be disposed of via infiltration and evaporation. Therefore, the project would have a less than significant impact on groundwater recharge and sustainable management of the SVGB.

ci) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site? ***Less Than Significant Impact.***

As described in a) above, construction operations have the potential result in erosion, siltation, pollution, and change in the ratio of groundwater recharge and runoff within the project site. However, in accordance with Mitigation Measures HYD/mm-1 and HYD/mm-2 from the Airport Master Plan IS/MND, the City's NPDES General Industrial Permit, and FAA requirements, the project proponent would be required to prepare a construction-related SWPPP prior to construction of the project, and BMPs required by the SWPPP would be implemented by the project contractor. As identified in *Section VI.7 Geology and Soils*, BMPs would be consistent with the recommended measures contained in the California Stormwater Best Management Practices Handbooks. Applicable measures may include the following:

- Stockpiling and disposing of demolition debris, concrete, and soil.
- Protecting existing storm drain inlets and stabilizing disturbed areas.
- Hydroseeding/re-vegetating disturbed areas.
- Minimizing areas of impervious surfaces.
- Implementing runoff controls (e.g., percolation basins and drainage facilities).
- Properly managing construction materials.
- Managing waste, aggressively controlling litter, and implementing sediment controls.
- Limiting grading to the minimum area necessary for construction and operation of the project.

Because all stormwater would be retained on-site, an operational SWPPP would not be required. However, stormwater retention and treatment would be conducted in accordance with Mitigation Measure HYD/mm-3 from the Airport Master Plan IS/MND and with the City's General Plan Policy 3.57. Therefore, the project would have a less than significant impact on erosion, siltation, and runoff.

cii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? ***Less Than Significant Impact.***

ciii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? ***Less Than Significant Impact.***

As described above, the project site is relatively flat and soils within and surrounding the project site consist mostly of sand and are somewhat excessively drained. Additionally, the majority of the project site is currently cement tarmac and no additional impervious surfaces would be created. Therefore, it is unlikely that the project would increase the rate or amount of surface runoff in a manner that would result in flooding on- or offsite. Additionally, because stormwater would be disposed of via infiltration and evaporation in the on-site detention basin in accordance with Mitigation Measures HYD/mm-1 and HYD/mm-2 from the Airport Master Plan IS/MND, the City's NPDES General Industrial Permit, and FAA requirements, the project would not create or contribute to runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

civ) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows? ***No Impact.***

The project site is mapped as an area of minimal flood hazard on the FEMA 100-Year Floodplain Map, and would therefore have no impact on flood flows.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation? ***No Impact.***

As described above, the project site is not located within a 100-year floodplain or flood hazard zone. Based on the Tsunami Inundation Map for Emergency Planning for the Marina quadrangle, the site is also not subject to inundation due to tsunamis. Soils within and adjacent to the project site are excessively drained sands and there are no bodies of water or steep slopes within or near the project site that pose a hazard for seiches or mudflows. Therefore, the project would have no impact related to release of pollutants due to inundation.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ***Less Than Significant Impact.***

The project consists of development in an industrial area, and would be required to comply with the Mitigation Measures HYD/mm-1 and HYD/mm-2 from the Airport Master Plan IS/MND, City's NPDES General Industrial Permit, and FAA requirements, which require the preparation of a construction-related SWPPP and implementation of standard BMPs during construction. Therefore, the project would not result in significant water quality or groundwater quality impacts that would conflict or obstruct implementation of a water quality control or sustainable groundwater management plan. This is a less than significant impact.

Conclusion

With incorporation of the mitigation measures identified in the Airport Master Plan IS/MND and BMPs, and compliance with FAA requirements and the City's NPDES General Industrial Permit, the project would have a less than significant impact on hydrology and water quality.

11. LAND USE AND PLANNING **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community? (Source: 1)	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (Source: 11, 13, 14, 21, 26, 28, 47)	☐	☐	☒	☐

Setting

The project is located within APN 031-111-037-000. The project would be constructed within the eastern portion of the Airport on a relatively flat area that consists mostly of concrete tarmac and small undeveloped areas. The site is bounded to the west by airport hangars, aircraft parking aprons and taxiways, office space, a fire station, parking lots, Imjin Road, and open space/habitat preserve; to the south by open space that is planned to be developed as the central north campus of the UC MBEST Center and Reservation Road; to the north by runways, taxiways aircraft parking aprons, and open space/habitat preserve; and to the east by an additional aircraft parking apron and taxiways, open space that is planned for development as the Airport Business Park, and Blanco Road (**Figure 1)**.

The project site is located within the City limits and is designated as Industrial/Service Commercial on the City's General Plan land use map and zoned A-1 (Airport Districts, Aviation-Related Zone) in the City Municipal Code (City, 2010a and 2019a). Zone A-1 accommodates two types of aviation-related uses: a) those uses requiring direct access to aircraft operating areas and apron sites and b) uses, which though not needing a site contiguous to the aircraft operating area, rely upon local air transportation or provide services and facilities required by other aviation-related uses. The City's zoning ordinance permits aviation-related manufacturing, assemblage, and research with Zone A-1.

The project site is also located within the boundaries of the approved Airport Master Plan, within the area designated for aviation-related purposes (**Figure 1**) (City, 2018a). While designated for aviation use, the tarmac areas have not been in demand by aviation users. Since 1995 when the City took over operation of the Airport, the tarmac areas have been utilized for revenue generation through a variety of non-aviation activity. Further, the tarmac areas are designated for aviation development in the current ALUCP and are considered by the FAA to be "improved" aviation land that must be reserved for aviation uses (County of Monterey Airport Land Use Commission, 2019). The FAA has determined that the continued use of the north and south tarmac areas by non-aviation users must end and that those operations be relocated to off of "improved" Airport land that is reserved for aviation activities. Therefore, development of the project would bring the land use back into compliance with the ALUCP and Airport Master Plan.

The project also site lies within the former Fort Ord and is subject to the requirements of the Fort Ord Reuse Plan and Fort Ord HMP. The project site is designated by the Fort Ord HMP as "development."

Discussion/Mitigation

*a) Would the project physically divide an established community? **No Impact**.*

The project is located within the Airport and would not physically divide an established community.

b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?* ***Less than Significant Impact.***

The project would not conflict with any applicable land use plan, policy, or regulation adopted for the purposes of avoiding and/or mitigating an adverse environmental effect. A consistency analysis was performed to ensure the project would be consistent with all relevant plans, policies, and regulations (e.g. the City's General Plan, Count's General Plan, Airport Master Plan, ALUCP, Fort Ord Reuse Plan, Fort Ord HMP) (see *Section III Project Consistency with Other Applicable Local and State Plans and Mandated Laws*). Two inconsistencies were identified:

- Mitigation measure CR/mm-1 in the Airport Master Plan IS/MND recommends a records search and preparation of a cultural resources assessment and technical report be prepared for future projects within the Airport, as recommended in the Cultural Resources Constraints Analysis. However, these actions were not conducted for the project because it was determined that the evaluation conducted for the Airport Master Plan sufficiently evaluates the project site and a project-specific assessment is not necessary. Additional detailed information regarding this inconsistency with the Airport Master Plan IS/MND is discussed in *Section VI. 5 Cultural Resources*.
- The City's General Plan provides thresholds for assessing project-level impacts in LOS. However, SB 743 creates a process to change the way that CEQA addresses transportation impacts. Specifically, the Governor's OPR is required to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Measurements of transportation impacts may include VMT, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated" (Ibid.). Once the CEQA Guidelines are amended to include those alternative criteria, auto delay will no longer be considered a significant impact under CEQA. SB 743 also amends congestion management law to allow cities and counties to opt out of LOS standards within certain infill areas. The CEQA Guideline changes proposed by OPR are still in draft form as of the writing of this IS; however, in an effort to use the most current and soon to be required approach, traffic impacts potentially resulting from the project are evaluated using VMT, rather than LOS. Additional detailed information regarding this inconsistency with the Airport Master Plan IS/MND is discussed in *Section VI. 17 Transportation.*

Due to the reasons described above, these inconsistencies do not result in a significant impact.

In addition, the project would be consistent with current zoning and land use designations. The project would be required to obtain a number of approvals and permits, listed in *Section II.F Project Approvals and Permits Required*, which would further ensure consistency with applicable regulations. Furthermore, the project is located within the plan area of the Fort Ord HMP and proposed Fort Ord HCP (see *Section VI.4 Biological Resources*, checklist item f) and the project was determined to be consistent with these plans. Where appropriate, this IS has identified a number of mitigation measures to further ensure that potentially significant impacts would be reduced to a less-than-significant. As a result, the project would not conflict with any policies adopted for the purposes of avoiding and/or substantially lessening an adverse impact.

Conclusion

The project would have a less-than-significant impact on land use and planning.

12. MINERAL RESOURCES **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (Source: 14)	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (Source: 11, 13)	☐	☐	☐	☒

Setting

In accordance with the Surface Mining and Reclamation Act of 1975, the California Geological Survey maps the regional significance of mineral resources throughout the state, with priority given to areas where future mineral resource extraction could be precluded by incompatible land use or to mineral resources likely to be mined during the 50-year period following their classification. The California Geological Survey delineates Mineral Resource Zones based on their mineral resource potential.

The project site is not located within a mapped Mineral Resource Zone (County, 2018a).

Discussion/Mitigation:

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? ***No Impact.***

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? ***No Impact.***

No mineral extraction occurs or is proposed within the project site, which is consistent with the City's zoning designation. Further, implementation of the project would not result in any large-scale development or other activities requiring significant removal of mineral deposits present. Therefore, the project would have no impact on mineral resources.

Conclusion

The project would have no impact on mineral resources.

13. NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Source: 11, 30)	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels? (Source: 11, 30)	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (Source: 11, 13, 21)	☐	☐	☒	☐

Setting

In the context of this document, "noise" is defined as unwanted sound. Environmental noise is frequently measured in decibels (dB). The A-weighted decibel (dBA) is used to reflect the human ear's sensitivity to sounds of different frequencies. On this scale, the sound level of normal talking is about 60 to 65 dBA. Because people are more sensitive to nighttime noise, sleep disturbance usually occurs at 40 to 45 dBA.

The most commonly used measurement scale used to account for a person's increased sensitivity to nighttime noise is the Community Noise Equivalent Level (CNEL). The CNEL is a noise scale used to describe the overall noise environment of a given area from a variety of sources. The CNEL is the 24-hour average noise level of all hourly continuous sound (Leq) measurements with an applied weighting factor to evening and nighttime values to reflect people's sensitivity to noise during those times. Ldn is also a commonly used measurement scale and is similar to CNEL except only a nighttime weighting factor is applied and evening hours are not weighted.

Generally, noise levels diminish as distance from the noise source increases. Some land uses are more sensitive to noise than others. Noise sensitive land uses are generally defined as residences, transient lodging, schools, hospitals, nursing homes, churches, meeting halls, and office buildings. Sensitive noise receptors in the project area consist of residences, which are located immediately adjacent to the main roads.

Construction noise is a temporary noise source that is generated from a variety of construction activities that occur both on- and off-site. These activities can include demolition, hauling of materials, grading, building construction, and construction traffic. Generally, construction equipment can generate noise levels in the range of 70 dB to 90 dB at a distance of 50 feet. However, construction noise is generally not constant during the daytime hours and stops toward the evening when construction crews complete their daily work.

The land use policies in the Community Land Use Element of the City's General Plan are designed to avoid conflicts between noise-sensitive land uses and major noise sources. City's General Plan Policy 4.107 utilizes the Ldn noise descriptor and establishes allowable noise standards for land use categories; a maximum exterior noise exposure limit of 60 dBA is identified for residential land use and other sensitive

land uses, and a 70 dBA is identified for industrial land use. Additionally, the City's General Plan Policy 4.111 establishes noise standards for stationary noise sources, as identified in **Table 13-1** below.

Table 13-1. Noise Standards for Stationary Noise Sources

Duration	Maximum Allowable Noise	
	Day ***(7:00 a.m. to 10:00 p.m.)***	***Night*** ***(10:00 p.m. to 7:00 a.m.)***
Hourly L_{eq} in dB[1,2]	50	45
Maximum Level in dB[1,2]	70	65
Maximum Impulsive Noise in dB[1,3]	65	20

[1]As determined at the property line of the receiver. When determining the effectiveness of noise mitigation measures, the standards may be applied on the receptor side of noise barriers or other property-line noise mitigation measures.

[2]Sound level measurements shall be made with slow meter response.

[3]Sound level measurements shall be made with fast meter response.

Source: City of Marina General Plan - Policy 4.111 (City, 2010a)

Discussion /Mitigation

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ***Less Than Significant Impact.***

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels? ***Less Than Significant Impact.***

Construction Noise Impacts

Noise from construction activities associated with the project could result in exposing persons to temporary, short-term noise increases and ground borne vibrations. Noise and vibration impacts from construction activities depend on the type of construction equipment used, the timing and length of activities, the distance between the noise generating construction activities and receptors, and shielding. Construction activities (i.e., cement removal, grading, building construction) would occur periodically.

City Ordinance 15.04.055 Construction Hours and Noise allows construction, repair work, or related activities that require a building, grading, demolition, use, or other permit from the city between the hours of 7 a.m. and 7 p.m. (standard time), and on Sundays and holidays between the hours of 10 a.m. and 7 p.m. (standard time) when construction noise is produced adjacent to residential uses, including transient lodging. However, the project site is not adjacent to residential uses or transient lodging, and therefore, this ordinance is not applicable to the project.

Implementation of Mitigation Measure 9.2 from the City's General Plan, which includes limiting construction hours and muffling and maintaining construction equipment, would reduce construction noise impacts to a less than significant level.

Operational Noise Impacts

Noise from operation of the manufacturing facility may include operation of equipment within the building, engine noise from delivery trucks, and vehicle noise from increased traffic. Operational noise within the manufacturing facility would be attenuated by the building and would be required to comply with the City's General Plan standards for maximum allowable noise from stationary noise sources, as identified above in **Table 13-1**.

The increase in traffic to the site would not result in a significant increase in noise levels at the project site given the proximity to existing traffic on Reservation Road and Imjin Parkway. However, sensitive receptors (two schools) within the UC MBEST Center facility are located closer to Reservation Road and Imjin Parkway than the project site. Based on the setback to the nearest point of the buildings at the UC MBEST site, the exterior noise level would be roughly 66 dBA CNEL. Additionally, delivery trucks on the driveway/entrance would produce diesel engine noise. However, given an average of 15 deliveries per day, and assuming two inbound and two outbound trips per hours, the average daily exterior noise level would be 56 dBA CNEL at 50 feet from the centerline of the driveway for an average speed of 45 mph. However, the speed is expected to be much lower, which would generate slightly lower noise levels. Additionally, there are no outdoor noise-sensitive areas at this location. Based on these exterior noise levels and assuming an average exterior-to-interior noise reduction of 25 dB, predicted interior noise levels would be approximately 41 dBA CNEL from the Reservation Road and Imjin Parkway traffic and 31 dBA CNEL from delivery traffic on the driveway. It is important to note that the UC MBEST Center is a newer structure and average exterior-to-interior noise reductions for newer structures typically range from 25-30 dB. As a result, predicted interior noise levels could be less. In addition, if the school's classrooms are further than the nearest façade setback, then predicted interior noise levels would be less.

Based on the analysis provided above, noise generated from project operations would not exceed standards established in the local general plan or noise ordinance. This is a less-than-significant impact.

c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?* ***Less Than Significant Impact.***

The primary source of existing noise in the project area is air traffic and vehicular traffic on adjacent roadways. FAA land use compatibility guidance is provided in 14 CFR 150 (Airport Noise Compatibility Planning). All types of land uses are acceptable in areas below the 65 dBA CNEL. Once noise levels meet or exceed 65 CNEL, noise-sensitive land uses are compatible only if specified noise level reductions are secured through project design and construction, such as new attic insulation and acoustically rated exterior doors, storm doors, and windows. Above the 65 dBA CNEL threshold, and without measures to reduce noise levels, land uses are generally considered incompatible with airport operations. The California Code of Regulations identifies 65 dBA CNEL as the level of noise acceptable to a reasonable person residing near an airport. This criterion level has been chosen for reasonable persons residing in urban residential areas where houses are of typical California construction and may have windows partially open. Additionally, the City's General Plan, ALUCP, and Airport Master Plan and provide noise exposure compatibility standards for land uses within the Airport. The ALUCP identifies that manufacturing uses are compatible at 70+ dBA CNEL and the City's General Plan and Airport Master Plan identify that exterior 70 Ldn and Interior 60 Ldn is acceptable for industrial uses. The project site is outside of the existing and 20-year forecast 60 dBA CNEL noise contour for the runway and would be compatible with airport operations. Therefore, the project would not expose people working in the project area to excessive noise levels from Airport operations.

Conclusion

The project would have a less than significant noise impact.

14. POPULATION AND HOUSING **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (Source: 2, 11, 16, 18, 43)	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (1, 11)	☐	☐	☐	☒

Setting

The County's population was 415,057 in 2010 and was estimated at 435,594 in 2018 (U.S. Census Bureau, 2019). Population in the County increased by just under five percent between 2010 and 2018, and growth has slowed considerably since the 1990s. Population growth in the City of Marina, one of 12 cities within the County of Monterey, has varied since the 1980s. Jobs and housing at the Fort Ord Army Base caused the City's population to swell 28 percent from 1980 to 1990, then drop nearly 29 percent from 1990 to 2000 when the base closed in 1994 (City, 2019b). The U.S. Census estimates that the City's population increased 14 percent between 2010 to 2018 from 19,718 to 22,535 (U.S. Census Bureau, 2019). Due to the redevelopment of former Fort Ord properties, the City's population is projected to continue increasing steadily in the future (City, 2019b).

In 2015, the City's labor force (i.e., all individuals who are able to work) was 11,300 and the unemployment rate was 8.4 percent (City, 2019b). At final build-out and peak production, the manufacturing facility would generate approximately 1,600 jobs, resulting in a significant increase in employment opportunities compared to the City's labor force. The additional employment opportunities could increase the City's employment rate and/or result in new residents in the area, potentially requiring additional housing.

Discussion/Mitigation

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? ***Less Than Significant Impact.***

The project would result in an increase in employment opportunities, which could increase the City's employment rate and/or result in new residents in the area, potentially requiring additional housing. It is likely that a significant portion of the manufacturing facility's 1,600 employees would be existing City or County residents. However, for a conservative analysis and assuming that all 1,600 employees would be new residents from outside the County, the project would increase the City's and County's estimated 2018 population by approximately seven percent and 0.4 percent, respectively.

Population growth and residential development were planned and anticipated in the City's and County's General Plans. The City's currently adopted General Plan only analyzes growth up to 2020; however, the City bases its population estimates and projected housing needs on population, housing, and employment forecasts prepared by AMBAG, whose 2018 Regional Growth Forecast projects growth up to 2040. **Table 14-1** below outlines AMBAG's projected changes in the City's and County's population, employment, and housing from 2015 to 2040.

Table 14-1. 2015 to 2040 Population, Employment, and Housing Forecast

Geography	Projected Change from 2015 to 2040		
	Population	***Employment***	***Housing Units***
City of Marina	+49%	+20%	+37%
County of Monterey	+16%	+16%	+17%

Based on AMBAG forecasts, the project would not substantially induce population growth or housing needs in the City or County beyond what has already been anticipated, and, therefore, would have a less than significant impact on population and residential development.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? ***No Impact.***

The project site is located within the Airport and is zoned for industrial use. Existing development within the site consists of roads and tarmacs. The project would not displace residents, and would have no impact on existing housing.

Conclusion

The project would have a less than significant impact on population and housing.

15. PUBLIC SERVICES **Would the project result in:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection? (Source: 11, 14, 18)	☐	☐	☒	☐
b) Police protection? (Source: 11, 14, 18)	☐	☐	☒	☐
c) Schools? (Source: 11, 14, 18)	☐	☐	☒	☐
d) Parks? (Source: 11, 14, 18)	☐	☐	☒	☐
e) Other public facilities? (Source: 11, 14, 18)	☐	☐	☒	☐

Setting

Fire Protection

A fire station is located within the Airport property (Building 514); however, it is not currently staffed. The project site is therefore serviced by the Marina Fire Department (MFD), located approximately 2.3 miles west of the project site at Marina City Hall. City firefighters receive aircraft rescue and firefighting training to respond to on-airport incidents.

Police Protection

Police protection is provided by the Marina Police Department (MPD), located approximately 2.3 miles west of the project site at Marina City Hall. The MPD currently employs 36 sworn officers and eight non-sworn personnel. MPD services include various police patrol services, vehicle abatement, records, including live scan fingerprinting, animal control, school resource officer services, various youth programs, and crime prevention through environmental design. The MPD has an average emergency response time of three to four minutes.

Schools

The project site lies within the Monterey Peninsula Unified School District, which encompasses the cities of Del Rey Oaks, Marina, Monterey, Sand City, and Seaside and serves more than 10,000 students. The district is comprised of three early education centers, 12 elementary schools, four middle schools, four high schools, and three charter schools. The district also offers alternative education and adult education programs. The project site is located immediately adjacent to the UC MBEST Center, which currently includes the Learning for Life Charter School for grades 7 through 12 and the Pine Hill School, a special education private school program. The project site is also located approximately two miles from the California State University Monterey Bay campus.

Parks

There are a variety of recreational resources—from Federal reserves, to State beaches, to small neighborhood parks—in the vicinity of the project site within the former Fort Ord and the City of Marina. These include Fort Ord National Monument, Fort Ord Dunes State Park, Marina State Beach, and various regional and local parks.

Discussion/Mitigation

a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?* ***Less Than Significant Impact.***

b) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?* ***Less Than Significant Impact.***

The project would result in an increase in employment opportunities, which may result in new residents in the area requiring increased fire and police protection services (see also *Section VI.14 Population and Housing*). However, population growth is planned and anticipated in the City's and County's General Plans, which include policies to expand fire and police protection services and facilities as needed.

Construction and operation of the project may also result in incidents requiring fire and police protection services. However, the Airport is part of the City's emergency response and evacuation plan. Mitigation Measure HAZ/mm-2 in the Airport Master Plan IS/MND requires the City to review this plan on an annual basis and update as necessary to account for additional development or changes in operations at the Airport. Therefore, the City's emergency response and evacuation plan would be updated as necessary and it is unlikely that any incidents requiring emergency response would exceed the capacity of City firefighters, who are trained to respond to on-airport incidents, and police to a degree that would require new or expanded facilities beyond those anticipated in the City's and County's General Plans. In addition, the manufacturing facility would be designed and constructed per applicable fire prevention/protection standards, and the Airport is protected by security fencing which meet all federal standards for security. Therefore, the project would have a less than significant impact on fire and police protection services.

c) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?* ***Less Than Significant Impact.***

d) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?* ***Less Than Significant Impact.***

e) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities? ***Less Than Significant Impact.***

The project may result in new residents in the area requiring additional schools, parks, open space, and other public services such as civic centers, childcare centers, or expansion of public transportation systems. However, the City's and County's General Plans anticipate growth and development of these public services and facilities as population increases. Therefore, the project would have a less than significant impact on schools, parks, and other public facilities. Please see also *Section VI.16 Recreation* below.

Conclusion

The project would have a less than significant impact on public services with incorporation of the mitigation measures identified in the Airport Master Plan IS/MND.

16. RECREATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (Source: 11, 14, 18)	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (Source: 11, 14, 18)	☐	☐	☒	☐

Setting

Recreation includes formally designated parks, trails, and open spaces, that provide activities like hiking and bird watching, as well as bodies of water where boating, fishing, and swimming are enjoyed. Recreation in the County is based on access to natural resources that are unique to the area, like the Monterey Bay shoreline, which contains one of the most significant and rare dune landforms on the west coast. Beach access, dune access, and hiking trails are available along the coast at recreational areas, including the nearby Fort Ord National Monument, Fort Ord Dunes State Park, Marina State Beach.

Approximately 293,781 acres of County land (almost 14 percent of the County's total land) is devoted to park and recreation facilities operated by various governmental entities. The County parks system, managed by the Monterey County Parks Department, makes up about 10 percent of the County's total park acreage. There are also eight county regional parks in the County managed by the Monterey Peninsula Regional Parks Department. These parks offer a rich variety of recreational opportunities for residents and tourists. Local parks and recreational facilities within the City include Marina City Park, Glorya Jean Tate Park, Vince Di Maggio Park, Windy Hill Park, Marina Equestrian Center, and the Preston Park Sports Complex.

Discussion/Mitigation

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? ***Less Than Significant Impact.***

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? ***Less Than Significant Impact.***

The project would result in an increase in employment opportunities, which may result in new residents in the area requiring recreation and expanded recreational facilities, such as local parks (see also *Section VI. 14 Population and Housing* and *Section VI.15 Public Services*). However, future recreational facility development is anticipated in the City's and County's General Plans. In addition, the County offers a broad range of recreation opportunities which attract thousands of tourists daily. As such, any increase in the local population resulting from the project would not substantially increase the use of neighborhood and regional parks such that substantial physical deterioration would occur or that would require unanticipated construction or expansion of recreational facilities. Therefore, the project would have a less than significant impact on recreation.

Conclusion

The project would have a less than significant impact on recreation.

17. TRANSPORTATION **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? (Source: 11, 12, 29)	☐	☒	☐	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? (Source: Source: 13)	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Source: 1, 12)	☐	☐	☐	☒
d) Result in inadequate emergency access? (Source: 11)	☐	☐	☒	☐

Setting

A traffic analysis was prepared for the project and is included as **Appendix E**. There are three primary roads that control access to the Airport. Imjin Road and Reservation Road west of Blanco Road are located within the City limits, while Blanco Road and Reservation Road east of Blanco Road are within the County. The following state, regional, and local agencies have plans and policies that should be considered when addressing potential transportation-related impacts of the project.

Marina Municipal Airport Business and Industrial Park/UC MBEST Center Specific Plan

A draft version of the Marina Municipal Airport Business and Industrial Park/UC MBEST Center Specific Plan (Airport Business Park Specific Plan) was completed in February 2017 (LSA Associates, Inc., 2017). The Airport Business Park Specific Plan outlines design guidance and standards for the proposed business park on the southeast side of the Airport. The south half of the business park is owned by the University of California and the north half is owned by the City. The circulation chapter describes the existing external roadway network and the planned internal roadway network. Airport Business Park Specific Plan roadway cross sections, intersection geometries and planned multimodal networks are provided.

Transportation Agency for Monterey County

The Transportation Agency for Monterey County (TAMC) is designated by the State of California as the regional transportation planning agency for the County. A regional transportation plan (RTP) is prepared every four years and provides a basis for state and federal funding allocations to transportation projects. The most recent RTP was prepared in 2014 and references the ongoing Master Plan effort at the Airport (TAMC, 2014).

TAMC proposes to improve the Marina-Salinas corridor by widening Reservation Road to four lanes from East Garrison Drive to Davis Road and widening Davis Road from Reservation Road to West Market Street (State Route 183). Blanco Road does not have proposed improvements. TAMC also envisions a bus rapid transit corridor between Marina and Salinas through the former Fort Ord.

Monterey County

The County's General Plan Circulation Element policies should be considered in that the project has the potential to impact County roads in the area. The County's General Plan identifies the acceptable level of service (LOS) for County roads and intersections shall be LOS D. In addition, it requires that a proposed development's impact on the County's circulation system be addressed and fees imposed on its applicants based upon a fair share traffic impact fee study.

Marina Airport Master Plan Mitigated Negative Declaration and Initial Study

The future indirect impacts of implementation of the Airport Master Plan are discussed in the Airport Master Plan IS/MND at a programmatic level. TR/mm1 is included in the mitigation monitoring and reporting program of the Airport Master Plan to ensure that future mitigation occurs, as necessary, when actual development projects occur. TR/mm-1 would reduce potentially significant impacts related to City transportation/traffic policies that could result from implementation of the Airport Master Plan to a less than significant level.

City of Marina

The City's General Plan Community Infrastructure policies are intended by the City to address the circulation and infrastructure planning requirements of Section 65302(b) of the State Government Code. The City's General Plan outlines several traffic related components that should be noted for the project. According to General Plan Policy 3.22, new major employers need to implement trip reduction measures achieving a 10% minimum reduction in peak hour vehicular traffic volumes. The City's General Plan states that the employee threshold for this mandate will be determined on a case-by-case basis. The City's General Plan's Mitigation Measure 7.3 outlines potential travel demand management (TDM) strategies to meet the mandated reductions. Some of the outlined measures include transit incentives, carpool parking spaces, shuttle service, shifted work schedules and telecommuting. The City's LOS significance threshold for assessing project-level impacts is LOS D except at segments or intersections that were lower than LOS D at the time of plan adoption. The City participates in TAMC's regional transportation fee program for fair share payments (Mitigation Measure 8.1(B)).

Discussion/Mitigation

a) Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? ***Less Than Significant Impact with Mitigation Incorporated.***

There are no conflicts with applicable City plans or policies related to public transit, bicycle, or pedestrian facilities resulting from the project. Figure 4-1 of the City of Marina Pedestrian and Bicycle Master Plan shows existing pedestrian facilities on airport property along Imjin and Neeson Roads. Figure 4-2 of the City's Pedestrian and Bicycle Master Plan shows existing and proposed bicycle facilities on airport property along Imjin Road (existing Class III) and along Neeson Road (proposed Class II). Implementation of the project would not adversely affect these existing and planned facilities. There are no existing or planned transit facilities at the Airport.

Trip generation for the project was calculated using the rates from the Institute of Transportation Engineers' (ITE) publication Trip Generation, 10th Edition, which is a standard reference used by jurisdictions for the estimation of trip generation. A trip is defined in Trip Generation as a single or one-directional vehicle movement with either the origin or destination at the project site. In other words, a trip can be either "to" or "from" the site. Therefore, a normal work-day commute would be counted as two separate trips (i.e., one to and one from the site).

Level of Service Assessment

Based on the project description and discussions with the project proponent, it was deemed that the most applicable land use is Manufacturing (ITE Land Use Code 140). The percentage split between office employees and manufacturing employees matches the ITE land use description. Also, the time-of-day distribution data presented in the Trip Generation manual for industrial land uses aligns with the planned 3-shift, 24-hour operations of the planned Project. The next factor considered was to base trip generation from the planned building area or the number of employees. Daily and peak hour trips were estimated using both the planned 580,000 square foot building area and a preliminary estimate of 3,000 employees (1,400 more employees than being proposed). The Project's trip generation is shown in **Table 17-1**.

Table 17-1: Trip Generation

Land Uses	*ITE Land Use Code*	Project Size		Daily Trips	AM PEAK HOUR				PM PEAK HOUR			
					Total Peak Hour	IN	/	OUT	Total Peak Hour	IN	/	OUT
Trip Generation Rates												
Land Use												
Manufacturing[1]	140	1	KSF	3.93	0.62	77%	/	23%	0.67	31%	/	69%
Manufacturing[2]	140	1	Employee	2.47	0.37	74%	/	26%	0.33	39%	/	61%
Trips Generated												
Manufacturing[1]	140	580	KSF	2,279	360	277	/	83	389	121	/	268
Manufacturing[2]	140	3000	Employees	6,739	813	602	/	211	611	189	/	422

Notes:
[1] Average rate used
[2] Equation used

Trip assignment was qualitatively assessed to determine which regional and local roadways the trips would utilize. Based on the regional distribution trips, trips from within Marina would access the project using Reservation Road and Imjin Parkway. Trips from the north would likely use State Route 1 southbound and exit at either Reservation Road or Imjin Parkway. Trips from the south would likely use State Route 1 northbound and exit at Imjin Parkway or Del Monte Boulevard or utilize surface streets, mainly the route consisting of General Jim Moore Boulevard, Lightfighter Drive, 2nd Avenue and Imjin Parkway.

It is understood that the project would affect the following locations, which are already at an inadequate LOS today:

1. Blanco Road and Cooper Road
2. Blanco Road and Armstrong Road
3. Blanco Road and Hitchcock Road
4. Blanco Road and Davis Road
5. Del Monte Boulevard and Reservation Road
6. Imjin Parkway and Reservation Road
7. Imjin Parkway and 2nd Avenue
8. Imjin Parkway and SR-1 Northbound Ramps
9. Imjin Parkway and SR-1 Southbound Ramps

In addition to the locations identified above, the project could add enough peak hour trips to cause impacts at other locations. This would be a significant impact that can be reduced to a less-than-significant level with the implementation of **Mitigation Measure TRA-1**.

Vehicle Miles Traveled (VMT) Assessment

SB 743 creates a process to change the way that CEQA addresses transportation impacts. Specifically, the Governor's OPR is required to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Measurements of transportation impacts may include VMT, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated" (Ibid.). Once the CEQA Guidelines are amended to include those alternative criteria, auto delay will no longer be considered a significant impact under CEQA. SB 743 also amends congestion management law to allow cities and counties to opt out of LOS standards within certain infill areas. The CEQA Guideline changes proposed by OPR are still in draft form as of the writing of this IS; however, in an effort to use the most current and soon to be required approach, traffic impacts potentially resulting from the project are evaluated using VMT, rather than LOS. OPR recommends that "a proposed [office] project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact."

CalEEMod was used to determine VMT for the Project. The output of CalEEMod is annual VMT which is then converted to Daily VMT. The thresholds of significance were determined from the most recent available version of the Caltrans Statewide Travel Demand Model (CSTDM) which provides VMT and VMT per employee for all of California in the year 2010 and 2040. The CSTDM is divided into transportation analysis zones (TAZ) and VMT data was extracted from TAZ 3262 which encompasses south and east portions of the City including the Airport. To determine existing (2019) VMT, the value was interpolated between the base model year, 2010, and the cumulative year, 2040. **Table 17-2** shows the Existing VMT per employee from CalEEMod and the CSTDM.

Table 17-2: Existing VMT per Employee

Study Group	VMT per Employee	Source
Joby Aviation	16.66	CalEEMod
TAZ 3262	22.37	CSTDM

Table 17-3 shows the thresholds of significance, 15% reduction from existing VMT per employee, for the region as compared to the project. As the VMT per employee was calculated using the preliminary estimate of 3,000 employees, the percent reduction from the threshold would be even greater for the 1,600 employees proposed as part of the project. Therefore, the project does not exceed regional VMT thresholds of significance and is expected to have a less-than-significant impact.

Table 17-3: VMT Thresholds of Significance

Study Group	VMT per Employee Threshold	Exceed SB 743 Threshold
TAZ 3262	19.01	No

Mitigation

MM TRA-1: Traffic Fee Program

Joby Aviation shall pay local and regional traffic impact fees, which will contribute to mitigating the traffic impacts from the project and other potential development in the area.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? ***No Impact.***

The project would be consistent with CEQA Guidelines Section 15064.3, subdivision (b).

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ***No Impact.***

The project would not include any design features that would increase transportation hazards.

d) Would the project result in inadequate emergency access? ***Less Than Significant Impact.***

The Airport is part of the City's emergency response and evacuation plan. Mitigation Measure HAZ/mm-2 in the Airport Master Plan IS/MND requires the City to review this plan on an annual basis and update as necessary to account for additional development or changes in operations at the Airport. Therefore, the City's emergency response and evacuation plan would be updated as necessary and it is unlikely that any incidents requiring emergency response would exceed the capacity of City firefighters, who are trained to respond to on-airport incidents, and police to a degree that would require new or expanded facilities beyond those anticipated in the City's and County's General Plans.

Conclusion

The project would have a less-than-significant impact to transportation with incorporation of the mitigation measures identified in the Airport Master Plan IS/MND and implementation of mitigation measures identified above.

18. TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 50201(k)? (Source: 14)	☐	☐	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (Source: 14)	☐	☐	☒	☐

Setting

California AB 52, in effect since July 2015, provides CEQA protections for tribal cultural resources. All lead agencies approving projects under CEQA are required, if formally requested by a culturally affiliated California Native American Tribe, to consult with such tribe regarding the potential impact of a project on tribal cultural resources before releasing an environmental document. Under California PRC §21074, tribal cultural resources include site features, places, cultural landscapes, sacred places, or objects that are of cultural value to a tribe and that are eligible for or listed on the CRHR or a local historic register, or that the lead agency has determined to be of significant tribal cultural value.

A Cultural Resources Constraints Analysis was prepared for the Airport Master Plan Update IS/MND by SWCA Environmental Consultants in October 2016 to determine if significant tribal cultural resources could be affected by implementation of the Airport Master Plan, as defined by CEQA. The NAHC was contacted on April 26, 2016, requesting a search of their SLF; a response was received on April 27, 2016 indicating "negative results." The response also recommended contacting the Amah Mutsun Tribal Band, Amah Mutsun Tribal Band of Mission San Juan Bautista, Costanoan Rumsen Carmel Tribe, Indian Canyon Mutsun Band of Costanoan, and Ohlone/Costanoan Esselen Nation. Letters sent from the City to the tribes on October 25, 2016 to see if they have any knowledge of cultural resources within the vicinity of the Airport or wanted to request consultation with the City regarding the Airport Master Plan. No tribes requested consultation.

Discussion/Mitigation

ai) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 50201(k)? ***No Impact.***

As indicated above in *Section VI.5 Cultural Resources*, there are no sites within the project site that are listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC §5020.1k.

aii) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. ***Less Than Significant Impact.***

The NAHC review of their SLF did not yield any results for the Airport. Additionally, the City's AB 52 tribal consultation regarding the Airport Master Plan yielded no requests for consultation from the tribes contacted. Because the project site is located within the Airport Master Plan area, the project would not result in an impact. Furthermore, no tribal cultural resources have been identified on the project site, and findings of these resources are unlikely because it is highly likely that any tribal cultural resources would have been discovered during previous groundwork for installation of the tarmac, which required significant grading and ground disturbance to a depth of approximately three feet. However, mitigation measure CR/mm-1 in the Airport Master Plan IS/MND includes measures for previously undiscovered archeological resources and/or human remains. Therefore, because the project would comply with the Airport Master Plan and implement applicable portions mitigation measure CR/mm-1, this is a less than significant impact.

Conclusion

The project would have a less-than-significant impact on tribal cultural resources with implementation of applicable mitigation measures included in the Airport Master Plan IS/MND.

19. UTILITIES AND SERVICE SYSTEMS **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Source: 11, 14, 36)	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years? (Source: 11, 14, 18)	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Source: 36, 37)	☐	☐	☒	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (Source: 11, 14, 36)	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (Source: 11, 14, 36)	☐	☐	☒	☐

Setting

Water and Wastewater

The Marina water supply system is owned and operated by MCWD, which is responsible for providing water service at the Airport and within the City. MCWD sources its water from the SVGB, which supplies many other communities beyond MCWD's service area. MCWD's groundwater withdrawals are approximately 3,200 AFY and account for less than one percent of total annual SVGB withdrawals. Furthermore, water demands within MCWD are significantly below state and regional averages due to the district's aggressive water conservation practices (MCWD, 2019).

New water system piping for the project would be installed and connected to MCWD's existing water supply infrastructure located on the western side of the project site (see Sheet C2 in **Appendix A**). If the project is phased, water demand is anticipated to be 5.74 AFY during Phase 1 and 14.92 AFY at final buildout. Water would be required for interior (domestic) uses, manufacturing processes, and landscape irrigation. Landscaping would conform to City of Marina landscaping requirements, and would include native, drought-tolerant plants. The irrigation system would meet current water efficiency standards, and would use recycled water to the greatest extent feasible.

MCWD is also responsible for providing wastewater service to the project site. New sanitary sewer infrastructure would be installed and connected to MCWD's existing sanitary sewer main, also located on

the southern border of the project site (see Sheet C2 in **Appendix A**). Sewage would be treated at the M1W wastewater treatment plant, located northwest of the project site within the City. Approximately 60 percent of all M1W wastewater intake is recycled, thereby reducing the discharge of treated wastewater into the Monterey Bay (M1W, 2019).

Storm Drainage

Stormwater would be dispersed and percolated on site via a detention basin (approximately 1.1 acre at final build out), which would be designed according to the City's General Plan Policy 3.57 and FAA design standards (see also *Section VI.10 Hydrology and Water Quality*).

Electricity and Natural Gas

Electricity service would be provided by MBCP and PG&E and natural gas would be provided by PG&E (see also *Section VI.6 Energy*). Power and natural gas lines would be installed and connected (underground) to existing PG&E infrastructure within Imjin Road.

Solid Waste

Solid waste in the City is managed by the MRWMD and disposed of at the Monterey Peninsula Landfill, located northwest of the project site within the City. The landfill currently receives less than 1,000 tons of solid waste per day (approximately 300,000 tons per year), but it is permitted to receive 3,500 tons of waste per day. At current disposal rates, the landfill has the capacity to accommodate development in the MRWMD service area for more than 100 years of waste.

Solid waste would be generated during construction; however, in order to reduce solid waste, the existing cement from the tarmac would be crushed and used as engineered fill under future development. Additionally, operation of the project would generate solid waste.

Discussion/Mitigation

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? ***Less Than Significant Impact.***

c) Would the project Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ***Less Than Significant Impact.***

The project site is serviced by MCWD and would tie into the existing water system. The project would comply with the City's General Plan Policy 3.45 and Mitigation Measure U/mm-2 from the Airport Master Plan IS/MND, which prohibit any development which would require water allocations in excess of the available water supply or in excess of the designated water allocation for the portion of the former Fort Ord within the City.

MCWD would also provide wastewater service to the project via the existing sanitary sewer main located on the western side of the project site, which would be treated at the M1W wastewater treatment plant. Wastewater generated from the manufacturing facility would not significantly affect MCWD's or M1W's treatment capacity. No industrial wastewater will be generated by the project.

As described in *Section VI.10 Hydrology and Water Quality*, the project would not significantly impact storm drainage facilities. Consistent with the Airport Master, storm drainage would be dispersed and percolated on site via a detention basin, which would be designed according to the City's General Plan

Policy 3.57, FAA design standards, and Mitigation Measure HYD/mm-3 from the Airport Master Plan IS/MND.

Power and natural gas lines would be installed and connected to existing PG&E infrastructure within Imjin Road. As described in *Section VI.6 Energy*, the project would not significantly impact energy use, including natural gas and electricity use. Additionally, the project site is in an urban infill area which is adequately serviced by existing telecommunication facilities, and would not require the relocation or expansion of such facilities.

The project would result in an increase in employment opportunities, which may result in new residents in the area requiring new or expanded water, wastewater treatment, storm drainage, electric power, natural gas, and telecommunication facilities (see also *Section VI. 14 Population and Housing*). However, population growth and expanded, more efficient utility services are anticipated in the City's General Plan. As such, any increase in the local population resulting from the project would not require the unplanned expansion or construction of new utility services or facilities.

For the reasons presented above, the project would have a less than significant impact related to the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities.

*b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years**? Less Than Significant Impact.***

As described above and in compliance with the City's General Plan Policy 3.45 and Mitigation Measure U/mm-2 from the Airport Master Plan IS/MND, the project would not require water allocations in excess of the available water supply or in excess of the designated water allocation for the portion of the former Fort Ord within the City. At final buildout, the project's anticipated 14.92 AFY water demand would be less than 0.5 percent of MCWD's total annual groundwater withdrawals. MCWD has indicated that it has adequate water to serve the project, and, if the project is approved for construction, would provide a "will serve" letter assuring adequate water is available to serve the project during normal, dry, and multiple dry years. Furthermore, the project would be consistent with the City's and County's General Plans, which anticipate population growth and expansion of water services as needed with increased residential development. The project would also comply with the City's General Plan Policy 3.53, which requires that all new construction use low-flow water fixtures and ultra-low-flush toilets. Therefore, this impact is less than significant.

As described under Response *a* above, wastewater generated from the manufacturing facility would not significantly affect MCWD's or M1W's treatment capacity. This impact is less than significant.

*d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? **Less Than Significant Impact.***

*e) Would the project Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? **Less Than Significant Impact.***

The Monterey Peninsula Landfill has adequate capacity to manage all solid waste disposal at the Airport, including waste generated from construction and operation of the project. In order to reduce solid waste generated during construction, the existing cement would be crushed and used as engineered fill under future development. In addition, although the project may result in new residents in the area requiring solid waste disposal (see *a* above), any population growth resulting from the project is anticipated in the City's and County's General Plans, and would not significantly impact MRWMD's

solid waste disposal capacity. The project is also consistent with the Airport Master Plan IS/MND, which determined that implementation of the Airport Master Plan would not interfere with the Airport's ability to meet mandated state or local diversion requirements. Therefore, these impacts are less than significant.

Conclusion

The project would have a less than significant impact on utilities and service systems with incorporation of the mitigation measures identified in the Airport Master Plan IS/MND.

20. WILDFIRE **If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan? (Source: 7, 8)	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? (Source: 7, 8, 11)	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (Source: 7, 8	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? (Source: 7, 8, 25)	☐	☐	☒	☐

Setting

The County of Monterey is characterized by moderate to very high fire hazard. Based on factors such as fuels, terrain, and weather, CAL FIRE recommends or adopts fire hazard severity zones in local and state responsibility areas, respectively. California Building Code Chapter 7a includes provisions for the construction of new buildings within very high fire hazard severity zones to improve the ignition resistance of buildings.

Discussion/Mitigation

a) Would the project Substantially impair an adopted emergency response plan or emergency evacuation plan? ***Less Than Significant Impact.***

b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? ***Less Than Significant Impact.***

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? ***Less Than Significant Impact.***

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? ***Less Than Significant Impact.***

The project site is not located within or near state responsibility areas or land classified as very high fire severity zones by CAL FIRE, and no change to the Airport's risk to wildland fires would occur from the project. In addition, the Airport is part of the City's emergency response and evacuation plan. Mitigation Measure HAZ/mm-2 in the Airport Master Plan IS/MND requires the City to review this plan on an annual basis and update as necessary to account for additional development or changes in

operations at the Airport. Therefore, the City's emergency response and evacuation plan would be updated as necessary to ensure that the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires (also see *Section VI.9 Hazards and Hazardous Materials*). In addition, the project site is a relatively flat lot in an area of minimal flood hazard (see *Section VI. 10 Hydrology and Water Quality)* and would not have a significant risk of slope instability due to wildfire. Therefore, the project would have a less than significant impact on wildfire.

Conclusion

The project would have a less than significant impact on wildfire with incorporation of the mitigation measures identified in the Airport Master Plan IS/MND.

VII. MANDATORY FINDINGS OF SIGNIFICANCE

NOTE: If there are significant environmental impacts which cannot be mitigated and no feasible project alternatives are available, then complete the mandatory findings of significance and attach to this initial study as an appendix. This is the first step for starting the environmental impact report (EIR) process.

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Source:)	☐	☒	☐	☐
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects) (Source:)	☐	☒	☐	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (Source:	☐	☐	☒	☐

Discussion/Mitigation

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? ***Less-than-Significant Impact with Mitigation Incorporated****.*

Based on the analysis provided in this IS, the project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Mitigation measures and standard permit conditions are identified for potential impacts of the project on biological resources, hazardous materials, and transportation to reduce these effects to a less-than-significant level.

b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)* ***Less-than-Significant Impact with Mitigation Incorporated.***

Based on the analysis provided in this Initial Study, the proposed renovation and expansion improvements may have significant cumulative traffic impacts. However, mitigation is identified to reduce these impacts to a less-than-significant level and are not considered cumulatively considerable.

c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?* ***Less-Than-Significant Impact.***

As identified in *Section VI.3 Air Quality*, the project has the potential to generate TACs during both construction and operational activities. The project would expose sensitive receptors, including students attending schools located within the UC MBEST Center and residents (to a lesser extent) to the southwest, as well as workers at the existing airfield adjacent to the northwest, to temporary emissions of TACs while construction takes place in the vicinity of these receptors. The primary health risks associated with construction emissions are cancer risk and exposure to particulate matter. In addition, diesel exhaust poses both a potential health and nuisance impact to nearby receptors. However, the exposure of sensitive receptors to construction emissions from the project would be short-term, intermittent, and temporary. In combination with the dispersive properties of DPM, and the fact that PM emissions would be less than MBARD emission thresholds, short-term construction would not expose sensitive receptors to substantial DPM emission levels. As a result, this impact would be less than significant.

Potential long-term exposure to TACs would be primarily associated with the aviation manufacturing facility operations, and would include heavy metals used during welding, machining, cutting & grinding, and blasting as well as aircraft painting (which would be conducted inside the building). In addition, the project would result in an increase in daily traffic trips, which would result in an increase in mobile-source CO and PM emissions. The increase in the emissions of TACs near a sensitive receptor is anticipated to have a health risk due to exposure of sensitive receptors as well as offsite workers to TAC emissions. MBARD's Rule 200 requires any business to obtain an ATC and Permit to Operate before installing or operating new equipment or processes that may release or control air pollutants to ensure that all MBARD rules and regulations are considered. As a result, the health risk associated with TAC emissions from the project is considered a potentially significant impact.

With compliance with MBARD permit requirements, the proposed project would have a less-than-significant impact to sensitive receptors due to long-term operations.

Conclusion

The project would have a less-than-significant impact on the environment with incorporation of standard permit conditions, BMPs, mitigation measures identified in the Airport Master Plan IS/MND, and implementation of mitigation measures identified in the sections above.

Note: Authority cited: Sections 21083 and 21083.05, PRC. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, PRC; *Sundstrom v. County of Mendocino*, (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

VIII. FISH AND GAME ENVIRONMENTAL DOCUMENT FEES

Assessment of Fee:

The State Legislature, through the enactment of SB 1535, revoked the authority of lead agencies to determine that a project subject to CEQA review had a "de minimis" (minimal) effect on fish and wildlife resources under the jurisdiction of the California Department of Fish and Wildlife. Projects that were determined to have a "de minimis" effect were exempt from payment of the filing fees.

SB 1535 has eliminated the provision for a determination of "de minimis" effect by the lead agency; consequently, all land development projects that are subject to environmental review are now subject to the filing fees, unless the California Department of Fish and Wildlife determines that the project will have no effect on fish and wildlife resources.

To be considered for determination of "no effect" on fish and wildlife resources, development applicants must submit a form requesting such determination to the Department of Fish and Game. Forms may be obtained by contacting the Department by telephone at (916) 631-0606 or through the Department's website at www.dfg.ca.gov.

Conclusion: The project will be required to pay the fee.

Evidence: Based on the record as a whole as embodied in the Planning Department files pertaining to DR 2019-27 and the attached Initial Study/Proposed (Mitigated) Negative Declaration.

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IX. REFERENCES

1. Project Plans. Prepared by Wald Rhunke & Dost Architects, LLP. and C3 Engineering, Inc. October 21, 2019.

2. [AMBAG] Association of Monterey Bay Governments. 2018. 2018 Regional Housing Forecast. Available online at: https://ambag.org/sites/default/files/documents/2018_Regional_Growth_Forecast.pdf

3. California Air Pollution Control Officers Association. 2017. California Emissions Estimator Model (CalEEMod). Model for Aviation Manufacturing Facility Project. Accessed October, 2019.

4. [ARB] California Air Resources Board. 2018. *Air Quality Standards and Area Designations*. Available online at: http://www.arb.ca.gov/desig/desig.htm. Accessed: May 2, 2018.

5. _____. 2005 (April). *Air Quality and Land Use Handbook: A Community Health Perspective.* Sacramento, CA.

6. California Department of Conservation. 2016. Monterey County Important Farmlands Map. Accessed May 2019. Available at: https://www.conservation.ca.gov/dlrp/fmmp/Pages/Monterey.aspx

7. [CAL FIRE] California Department of Forestry and Fire Protection. 2007. Fire Hazard Severity Zones in SRA, Monterey County. Available online at: https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/

8. _____. 2008. Fire Hazard Severity Zones in LRA, Monterey County. Available online at: https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/

9. [Caltrans] California Department of Transportation. 2017. California Scenic Highways. Available online at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

10. [CEMA] California Emergency Management Agency. 2009. Tsunami Inundation Map for Emergency Planning—Monterey County. Available online at: https://www.conservation.ca.gov/cgs/tsunami/maps/monterey

11. [City] City of Marina. 2010a. General Plan. Adopted October 31, 2000, Updated with amendments through August 4, 2010. Available online at: https://www.cityofmarina.org/164/General-Plan

12. _____. 2010b. City of Marina Pedestrian and Bicycle Master Plan. Adopted February 2, 2010. Available online: https://www.tellusventure.com/downloads/infrastructure/marina_bike_ped_master_plan_2feb2010.pdf

13. _____. 2018a. Marina Municipal Airport Master Plan – Final Report. Prepared by Coffman Associates. May. Available online at: http://marina.airportstudy.com/

14. _____. 2018b. Marina Municipal Airport Final Mitigated Negative Declaration and Initial Study on the Proposed Airport Master Plan. Prepared by Coffman Associates. April. Available online at: http://marina.airportstudy.com/

15. _____. 2019a. Marina Municipal Code. Available online at: https://www.codepublishing.com/CA/Marina

16. _____. 2019b. Midterm Review of 2015-2023 Housing Element. Available online at: https://www.cityofmarina.org/DocumentCenter/View/10291/Midterm-Review-of-Marina-2015-2023-HE

17. [City and FAA] City of Marina and Federal Aviation Administration. 1995. Final Environmental Assessment/Environmental Impact Report (Volume 1) Marina Municipal Airport.

18. [County] County of Monterey. 2010. General Plan. Adopted October 26, 2010. Available online at: https://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency-rma-/planning/resources-documents/2010-general-plan

19. _____. 2018a. County of Monterey Mineral Resource Zones Map. Available online at: https://www.arcgis.com/home/item.html?id=0a1f9ac07785495298670cb2d6a598dd

20. _____. 2018b. County of Monterey Williamson Act Map. Available online at: https://www.arcgis.com/home/item.html?id=ff990769c5a045f0a6180e18759e991e

21. County of Monterey Airport Land Use Commission. 2019. Marina Municipal Airport Comprehensive Land Use Plan. Adopted May 30, 2019. Available online at: https://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency-rma-/planning/resources-documents/airport-land-use-plans

22. [DD&A] Denise Duffy & Associates, Inc. 2019. Joby Aviation Manufacturing Facility Biological Resources Report. December.

23. [FAA] Federal Aviation Administration. 2007. Advisory Circular 150/5200-33B, Hazardous Wildlife Attractions on or Near Airports, August 28. Available online at: https://www.faa.gov/airports/resources/advisory_circulars/

24. _____. 2013. Advisory Circular 150/5310-5D, Airport Drainage Design, August 15. Available online at: https://www.faa.gov/airports/resources/advisory_circulars/

25. [FEMA] Federal Emergency Management Agency. 2019. Flood Map No.06053C0195H, effective on 06/21/2017. Available online at: https://msc.fema.gov/portal/home

26. [FORA] Fort Ord Reuse Authority. 1997. Fort Ord Reuse Plan Volumes 1, 2, 3, and 4. Prepared by EMC Planning Group, Inc. and EDAW, Inc. Available online at: https://www.fora.org/BRP.html

27. ICF International, Inc. 2017. Administrative Draft Fort Ord Habitat Conservation Plan. August. San Francisco, CA. Prepared for the Fort Ord Reuse Authority, Marina, CA. Unpublished.

28. ICF Jones & Stokes. 2008. 2007 Monterey County General Plan, Draft Environmental Impact Report. Available online at: https://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency-rma-/planning/resources-documents/2010-general-plan/draft-environmental-impact-report-deir

29. Kimley Horn and Associates, Inc. 2019. Preliminary Traffic Impact Evaluation for Joby Aero, Marina, CA. March.

30. Legleiter, Kurt. October 23, 2019. Personal communication.

31. LSA Associates, Inc. 2017. Specific Plan; Marina Municipal Airport Business and Industrial Park/UC MBEST Center; City of Marina, California; University of California.

32. [MBARD] Monterey Bay Air Resources District. 2008. CEQA Air Quality Guidelines. Available online at: http://mbard.org/programs-resources/planning/ceqa/

33. _____. 2018a. *NCCAB Area Designations and Attainment Status.* Available online at: http://mbard.org/programs-resources/planning/ceqa/.

34. _____. 2018b. *Air Quality Plans*. Available online at: http://mbard.org/programs-resources/planning/air-quality-plans/.

35. [MBCP] Monterey Bay Community Power. 2019. FAQ. Available online at: https://www.mbcommunitypower.org/about/faq/

36. [MCWD] Marina Coast Water District. 2019. Securing Our Water Supply. Available online at: https://www.mcwd.org/gsa_water_supply.html

37. [M1W] Monterey One Water. 2019. Primary and Secondary Treatment. Available online at: https://montereyonewater.org/facilities_secondary_treatment.html

38. Muegge, H. October 22, 2019. Personal communication.

39. Soil Surveys Group, Inc. 2019. Geotechnical Investigation for the Proposed Canopy Tent Addition to be Located at 3200 Imjin Road, APN 031-111-037, Marina, California. July.

40. SWCA Environmental Consultants. 2016. Marina Airport Master Plan Update Cultural Resources Constraints Analysis. October.

41. [TAMC] Transportation Agency for Monterey County. 2014.

42. [Fort Ord BRAC] U.S. Army, Fort Ord Base Reuse and Cleanup. 2019. Fort Ord Groundwater Factsheet. Available online at: https://fortordcleanup.com/factsheets/.

43. U.S. Census Bureau. 2019. QuickFacts for City of Marina and Monterey County, California. Available online at: https://www.census.gov/quickfacts

44. [USACE] U.S. Army Corps of Engineers. 1993. Fort Ord Disposal and Reuse Environmental Impact Statement, Final, Volumes I, II, and III. Technical assistance from Jones & Stokes Associates, Inc. December 1993. Sacramento, CA. Available online at: http://fortordcleanup.com/documents/administrative-record/ (Administrative Record #BW-0486)

45. _____. 1995. Environmental Baseline Survey Fritzsche Army Airfield Parcel, Fort Ord, California. Prepared by Harding Lawson Associates. Available online at: https://fortordcleanup.com/documents/search/ (Administrative Record #OTH-110).

46. _____. 1996. Final Supplemental Environmental Impact Statement, Fort Ord Disposal and Reuse. June. Available online at: https://fortordcleanup.com/documents/search/ (Administrative Record #BW-1538)

47. _____. 1997. Installation-Wide Multispecies Habitat Management Plan for Former Fort Ord, California. April. Sacramento, CA. Available online at: http://fortordcleanup.com/documents/administrative-record/ (Administrative Record #BW-1787)

48. [Army] U.S. Department of the Army. 1995. Finding of Suitability to Transfer (FOST) for Fritzche Army Airfield Parcel, Phase I, Former Fort Ord, CA. Available online at: http://fortordcleanup.com/documents/administrative-record/ (Administrative Record #OTH-148)

49. [USFWS] United States Fish and Wildlife Service. 1993. Biological Opinion for the Disposal and Reuse of Fort Ord, Monterey County, California (1-8-93-F-14). October. Available online at: https://fortordcleanup.com/reference-documents/habitat/

50. _____. 2017. Reinitiation of Formal Consultation for Cleanup and Property Transfer Actions Conducted at the Former Fort Ord, Monterey County, California (Original Consultation 8-8-09-F-74, 81440-2009-F-0334). June. Available online at: https://fortordcleanup.com/reference-documents/habitat/

51. Zhu, Y., W. C. Hinds, S. Kim, and C. Sioutas. 2002. Concentration and Size Distribution of Ultrafine Particles Near a Major Highway. *Journal of the Air & Waste Management Association* 52(9):1032–1042. DOI: 10.1080/10473289.2002.10470842. Available online at: http://dx.doi.org/10.1080/10473289.2002.10470842. Accessed October 24, 2019.