## **Richard James**

From: Bob Nunes <BNunes@mbard.org>
Sent: Monday, November 21, 2016 1:33 PM

To: Richard James Cc: David Frisbey

Subject: RE: Salinas Economic Development Element AQ Plan Consistency Determination

## Hello Richard,

Thank you for confirming the specific components of the project description for the EDE. Since there is no residential component to the EDE, a consistency determination is not necessary.

Thanks,

## **Bob Nunes**

Air Quality Planner
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From: Richard James [mailto:james@emcplanning.com]

**Sent:** Wednesday, November 16, 2016 7:51 AM

**To:** Bob Nunes **Cc:** David Frisbey

Subject: RE: Salinas Economic Development Element AQ Plan Consistency Determination

Bob-

Thanks for your prompt reply. There are no residential uses specifically proposed within any of the identified opportunity areas by the Economic Development Element. However, in looking at the map, I see the City's "future growth areas" north of Boronda Road are included and they have significant amounts of housing, already accounted for in the City's General Plan. If you limit the discussion to the areas outside the SOI, then there is no discussion of residential uses in the Economic Development Element, and no guidance from the Land Use Element because the areas are not included on the City's land use map. So I think from that, one has to conclude that the areas that would be changed by the Economic Development Element are all commercial/retail/industrial. The traffic report focuses only on the "target areas" shown on NOP Figure 5, as summarized in NOP Table 6. The following discussion of VMT from the traffic report confirms the assumption that only commercial uses would be within those areas:

Although the proposed project adds many additional trips at the site locations due to the large amount of new jobs, the net overall net growth of VMT in Salinas as a result of the project is six percent in the Existing with Project scenario and two percent in the Cumulative with Project scenario. This is due in part to the model predicting that adding many jobs in housing-rich Salinas will result in shorter trips as people begin to live and work in Salinas. Another explanation is that people will be less willing to travel greater distances as congestion in the City increases.

There is some language in the NOP and EIR project descriptions regarding providing enough jobs to support the anticipated housing, although I have not found any numerical analysis behind this. However, that said, I've so far been working off the project descriptions prepared for the NOP and EIR, and have not delved into the draft Economic Development Element itself, or any of the supporting reports. I did skim the General Plan's discussion of jobs/housing balance, and did not find any useful information there.

## Richard

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From: Bob Nunes [mailto:BNunes@mbard.org]
Sent: Tuesday, November 15, 2016 3:30 PM

**To:** Richard James **Cc:** David Frisbey

Subject: RE: Salinas Economic Development Element AQ Plan Consistency Determination

Hello Richard,

Thanks for sharing the NOP and inquiring about a consistency determination. At first glance, this project appears to involve Industrial, Retail and Business Park land uses. Are there any residential developments expected in this economic development plan?

Thank you,
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**From:** Richard James [mailto:james@emcplanning.com]

Sent: Tuesday, November 15, 2016 2:29 PM

To: Bob Nunes

Subject: Salinas Economic Development Element AQ Plan Consistency Determination

Bob -

I am preparing the air quality section of the Salinas Economic Development Element EIR, and would appreciate a formal Air Quality Plan consistency determination from the Air District. The project is an amendment to the Salinas General Plan to add a new Economic Development Element. I have attached the NOP, which was issued last year, as it contains a full description of the proposal, including maps and tables summarizing the project. I suggest focusing on Table 7 on page 20, which summarizes the acreage proposed for commercial/industrial development that is outside the City's sphere of influence, or in areas within the City limits not considered for development in the General Plan (and thus not included within the Land Use Element assumptions). Note also, the proposed development of new infrastructure to serve these areas, including an expanded version of the bypass road, now referred to as an expressway, and proposed to circle the City's developed areas. All of the anticipated development within the various economic opportunity areas (EOAs) is proposed to be commercial and/or industrial development.

Please let me know if you have any questions about the proposal.

Richard

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