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Subject: Monterey High School Athletic Field Improvements, Proposed Draft Mitigated Negative Declaration (MND), Review of parking and traffic issues

Dear Ms. Erickson,

Background and Scope

Per your request, I have reviewed the MND for the above-referenced project and provide you with the following comments for the *Monterey High School Athletic Field Improvements* project. I am an environmental professional with 30 years of experience preparing and reviewing environmental documents, both in the private and governmental sector, with a master's degree in Urban and Regional Planning. I have lived in the Monterey Peninsula area for more than six years. Most recently, I served as the interim Planning Services Manager of the Long-Range Planning Department of Monterey County, and prior to that served as planning policy advisor to the Monterey County Agricultural Commissioner. I have taught CEQA courses at the University of California Santa Barbara, and served as the environmental program manager for a national consulting firm for several years, where I prepared and reviewed CEQA and NEPA documents and managed a team of environmental planners. I am qualified to provide your firm with a review as to the adequacy of the environmental analysis prepared for the project.

I have reviewed the MND, the MND appendices, and project FAQs published by MPUSD, and other documents as described in this letter. I am generally familiar with

downtown Monterey and Pacific Street. Pacific Street is classified by the City of Monterey as a minor arterial (City of Monterey General Plan, Table 4.) Most of the block of Pacific adjacent to the high school is signed for no parking on the west (school) side. On August 24, 2019, I conducted a site visit at the Monterey High School campus to assess the project area and existing parking availability. I also drove around the surrounding residential areas to observe and research the streets including Herrmann, Larkin, Madison, Via Del Rey, El Caminito, El Caminito del Sur, Martin, Woodcrest, Via Campagna, Via Chualar, Via Paraiso, Logan, and others.

This letter addresses the potential parking and traffic aspects of the proposed project. In my professional opinion, lighting and noise impacts also would be potentially significant adverse changes on the environment. I understand you are obtaining separate subject matter expert opinions in those subjects.

Executive Summary

The MND is fundamentally flawed because the whole of the project has not been disclosed. All phases of the project, including implementation and operation, should have been included in order to conduct a complete analysis of project impacts as required by CEQA. The MND contains an incomplete description of the proposed physical changes and the MND omits a reasonable discussion of the changes that are reasonably anticipated to the level of use and activities as a result of the project. In my opinion the proposed project's increase in operational uses would have potentially significant adverse impacts on parking and traffic and an environmental impact report should be prepared to address the impacts.

Comments

The MND does not include either a parking baseline or a parking analysis. Both are important elements of planning and analyzing the impacts of large event venues. Anyone who has been to stadiums and arenas is familiar with the need for parking for attendees. An adequate parking analysis is essential where there is no significant mass transit providing access to the site, as at the Monterey High School site. It also is essential for existing venues where new uses are being proposed, as with the Monterey High School proposal for new and additional night-time games and events.

The project proposes several new elements, including new 500-seat bleachers at the stadium, a new multi-use field, and three new sets of 5-row bleachers at the new multi-use field. The seating of the three sets is not specified. From the size on the MND drawing as compared to the 500-seat bleachers, a conservative estimate would be five

rows of 10 seats, or 50 seats per bleacher, for a total of 150 seats. Thus, the existing seating capacity would be increased by 650 seats over the baseline of 1180 seats in the existing bleachers. The 1180 seats was not presented as the baseline, nor was it revealed anywhere in the MND discussion. I was able to decipher the figure of 1180 seats from blowing up the tiny print in MND Figure 5. The total post-project bleacher seating would be 1180 plus 650, or a total of 1,830 seats. The MND fails to provide any quantitative or qualitative analysis of this information.

Parking

The project also proposes to remove some existing elements, including the use of the 2.16-acre dirt area that is “currently used for occasional, informal parking,” according to the MND. The MND fails to adequately characterize or analyze the loss of parking in the field, which is utilized for parking during home football games and other large events. The project setting as stated in the environmental document is materially incomplete and misleading because it fails to disclose that there is a residential neighborhood immediately adjacent on the west side of the school campus.

The total number of existing available parking spaces should be counted. This includes the spaces on the 2.16 acre “informal” parking area that would be lost through project implementation. If an area that is 180 feet by 242 feet (approximately 1 acre) is designed with six rows of striped parking spaces with each parking space being approximately 10 feet by 18 feet and the traffic lanes are 24 feet wide, approximately 150 spaces can result. In this example, there could be three pairs of parking rows, each containing 48 spaces. An average of 120 cars can park on one acre of flat land. Many areas used for parking are not flat, are not perfectly square and do not accommodate lined or formal parking spaces. Accounting for these and other imperfections in areas that are used for parking, a conservative estimate is the capacity to park between 80 and 100 vehicles per acre. Using this conservative calculation, this puts the estimate of cars on the 2.16-acre mostly flat dirt field at 173 cars to 216 cars. This is a rough calculation. The actual figure should be investigated and presented as part of an adequate traffic and circulation analysis in the CEQA document.

It is estimated that MHS currently contains approximately 180 total parking spaces on impermeable surfaces that are striped or otherwise have some level of formality. Thus, the current parking capacity is approximately 353 to 396 spaces. (This is calculated by adding 180 spaces existing to the conservative low estimate of 173 and the conservative high estimate of 216 existing on the dirt lot.) The conversion of the dirt area to a non-parking use would mean the loss of capacity for 173 to 216 vehicles. That would cut the available parking capacity to 180 spaces, which is approximately or slightly less than half

the current capacity. The project description states that it will add “approximately 10” spaces (MND, p. 3). That would bring the net number of post-project spaces to 191, which is still approximately half of the current number. 191 spaces would be 163 to 206 fewer spaces than currently available. The MND does not include any analysis of the projected parking demand for all the new and expanded uses proposed at the site that are part of the project and reasonably foreseeable.

The loss of the parking on the 2.16 acre informal lot and the increased seating capacity by 650 seats are reasonably likely to or would increase the need for parking, and the pressure for parking to occur off site and in neighborhoods. The existing parking, even with the availability of the informal dirt lot, is inadequate to support current football events and the current events impact the surrounding residential area to some extent. Residents report that the four games per year typically result in significant amounts of overflow parking into the neighborhood streets.

Given the increase in the number and general scale of the events that would occur at the MPUSD athletic field, the environmental analysis should include address the impacts of the loss of this lot. This is a potentially significant environmental issue that would increase traffic/parking congestion and public safety issues, yet it is not addressed in the draft MND. The elimination of parking would have impacts for all events for which the parking is currently used including all school and non-school events, in addition to football and other new uses that would occur during the day and at night as a result of the project. The environmental document does not adequately investigate, discuss, disclose, and mitigate these issues and impacts.

The project description and the associated analysis for individual issue areas as required by CEQA should be revised to include a comprehensive and detailed accounting of each type and the total number of sports events that currently occur on the high school athletic field, as well as the projected number of sports or other events at the stadium and at the new multi-use field. The information should include the times of day and the maximum attendance at each. An accounting of the attendance and parking information of the larger sporting events that historically have been held at other venues in Monterey County (such as MPC) must be provided, to the extent these events could foreseeably or would be likely to take place at the Monterey High School after project implementation. That is essential information needed to inform the analysis of likely future parking demand in the post-project scenario, and the analysis of the impacts thereof.

The project parking demand analysis should address how moving these larger team sports events to the smaller neighborhood stadium venue would be achieved and mitigated

given the known limitations on parking in the campus and the immediate residential neighborhood and other adjacent surface streets. The foreseeable spillover of event parking into the neighborhood would likely eliminate or reduce available parking for neighborhood residents and their guests. This should be analyzed in a CEQA document. The CEQA document should provide analysis on the number of cars that would likely to park off-campus due to lack of available on-campus parking.

I observed that most of the streets are narrow and winding. Many contain “no parking at any time” signage. This appears to be because the streets are too narrow for parking, or too winding, or have too many blind driveways, or other safety or use reasons. Other streets prohibit parking from 7-4 (or similar mid-day hours) on school days. Other streets are restricted to 1-hour parking 24 hours/day except for vehicles with residential parking permits for the area.

It is reasonably foreseeable and likely that overflow parking from the proposed project would significantly impact the surrounding streets, because there is no alternative for event attendees discussed in the MND. It also is reasonably foreseeable and likely that the neighborhood would be significantly impacted by the traffic and parking needs of the attendees of MPUSD events. The already limited and restricted neighborhood parking capacity would be significantly impacted by the lack of available campus parking to accommodate the reasonably foreseeable parking demand resulting from the campus events after the proposed project is built.

The neighbors report that often there is illegal parking for athletic events, even in the 1-hour resident-only streets. Their only resource is to call the police, who have other priorities on Friday nights in downtown Monterey, which is the social activity center for the peninsula. Once reported, the police must come mark the cars, and return after an hour to ticket them. Even if the police ticket the illegally parked cars, that does not ameliorate the impact of the parking. Tickets do not mitigate for the parking impacts on the neighbors and the neighborhood, or for the safety impacts to vehicular and pedestrian traffic in the immediate area.

It is reasonably foreseeable that the nearby streets on which parking is prohibited up to 4 PM on school days would be impacted by evening and night parking from attendees at night-time events at the school that would be made possible by the proposed addition of permanent stadium lighting. It also is reasonably foreseeable that the residents of those streets would take action to get their streets designated as “no parking at any time” or limited to 1-hour parking. The initial study does not consider or mitigate this foreseeable scenario or consider where the vehicles would park when that happens.

The MND should clearly state and analyze the impacts of the hours and frequency of events, the types of events, and the anticipated maximum number of attendees at the different types of events, based on verified data. This information is not described in any part of the document.

Darkness is also a pertinent factor. I have reviewed the 2019 Monterey High School football schedule which shows a start time of 7:30 PM starting in September 2019 through November 2019, with a single start time of 7 PM.

([https://www.maxpreps.com/high-schools/monterey-toreadores-\(monterey,ca\)/football/schedule.htm](https://www.maxpreps.com/high-schools/monterey-toreadores-(monterey,ca)/football/schedule.htm) [The schedule does not include playoffs].)

According to online records, sundown is at 7:29 on September 6, 2019 and moves up to 6:11 PM on November 1, 2019. Thus, all games will start after sundown, except perhaps for one that will start half an hour before sundown. The timing means people would be looking for parking in the dusk at best, and in the dark at worst. Some people may have parked for an earlier JV game, if there was one, which means parking is already taken. Some of those foreseeably would be returning to their cars, which can create conflicts between pedestrians and vehicles given the narrow and curving streets.

Traffic

The entire MND discussion is on pages 64 and 65. The MND concludes as follows: “The circulation system on and near the project site currently accommodates the existing sports facility and high school campus. Development of the proposed project would not result in a substantial increase in vehicular traffic in ways that would conflict with the performance of the existing, surrounding circulation system.” The MND does not present the baseline as to existing traffic, and the MND does not have an adequate traffic study that describes and quantifies the traffic associated with the operational phase of the project. The MND omits this essential information and its conclusion of “no substantial increase” is not supported.

The project proposes to increase the seating capacity at the athletic fields by more than 50%, from 1,180 seats to 1,830 seats. Nothing would prohibit both fields from being used at once. Other capacity includes the participants in the event or game, and the support staff, coaches, and other sources of traffic. A traffic study should be prepared as part of an environmental impact report to assess the existing level of traffic generated by the events conducted at the athletic fields, then compared with the proposed number of events that would occur after project improvements are completed. The traffic study should consider the circulation and ingress and egress of cars to and from the campus, as well as to and from the neighborhood. The traffic study should investigate and quantify the additional number of traffic trips and surrounding level of service for pre- and post-

project conditions once the existing versus proposed events are characterized in the environmental document. This analysis should be informed by reliable information about parking availability, safety and other restrictions.

The project would create potentially hazardous situations as people drive around and look for parking in the dark given the existing conditions of surrounding streets, the lack of sidewalks/streetlights, the lack of crosswalks, the curves in many of the neighborhood streets, the blind corners, many of which do not have stop signs, and several steep gutters for runoff from hills directly above. The hazards would be exacerbated because it is foreseeable that the drivers would not be familiar with the streets especially in the dark. Finally, event attendees who are in vehicles who park in the neighborhoods would get out of their cars and as pedestrians would be forced to navigate unfamiliar roads most of which are not smooth due to tree roots, paving patches, runoff, and other common causes. The streets surrounding the high school present a public safety hazard when cars are parked illegally, which regularly happens during high-demand events at the high school, according to MND comments submitted by neighbors to MPUSD.

The reasonably foreseeable consequences of the project are that event attendees and the neighbors generally would be affected by parking and traffic impacts that do not currently exist in the neighborhood. The operational use of the project could and is likely to create an after-dark traffic-snarling parking-congested activity in the middle of the surrounding quiet single-family residential areas. The residential areas near the high school tolerate the weekday daytime congestion of school drop-off and pick-up and the usual daytime games. Since approximately 2007 or 2009, depending on different records, the surrounding residential area has also had the impacts of four night-time football games against the football team's lesser rivals. The fact that the games are against lesser rivals is relevant because this logically would mean that there is a lower attendance than against major rivals. The addition of evening and night-time games against the major rivals, along with additional night events and games, would mean more parking and traffic impacts than the four home games currently played at Monterey High School each year. This increase in the level of use and attendance must be clearly characterized and analyzed in the environmental impact report for all aspects of the project impacts, including traffic, parking, lighting and noise.

Documents dated subsequent to the release of the MND

I reviewed a two-page document called "Monterey High School Stadium Improvement Project Frequently Asked Questions (FAQs)." The document is not dated, but it refers to a past event that was on August 15, 2019, so the document was prepared after that date. That is more than 20 days after the MND was released for public review. The FAQs state

that additional parking would be considered later by MPUSD, when the “fields should be under construction”. If additional parking near the new multi-use field as well as by the District Office are planned, as the FAQs state, then this should be included in the CEQA project description and in the CEQA analysis of parking because apparently the additional parking is planned to address parking needs that would be caused by the loss of parking due to the stadium project implementation. It is part of the whole of the action of the stadium project. This analysis should not be deferred to a later date.

I have reviewed a July 29, 2019 email thread involving MPUSD employee Paul Anderson and the MND preparer. July 29 was four days after the MND was released for public review. In the email thread the MND preparer requested additional details of the proposed events and number of nighttime events. His request was in response to early neighborhood comments on the MND. The school district responded by stating: “We do not want to limit our night usage to one sport or times”. The MND did not discuss any such limitation, and the school district email confirms that the project scope contains no limitation on the number, type, hours, and times of year of the night-time events that could or would be conducted after project improvements are made. This would be a material change to the current operation of the stadium. The proposed changes are part of the project. An adequate environmental analysis cannot be conducted or completed until this information is known.

Conclusion

The MND prepared on behalf of the Monterey Peninsula Unified School District lacks critical information needed to evaluate the environmental impacts of the proposed improvements because the project description does not provide information regarding the existing or proposed level of use of the Athletic Field and of the proposed multi-use field, as well as the other project elements. As described above, no baseline of the annual total number/frequency of existing sports and number of attendees of events is presented, nor is the proposed increase in the number and scale of sports (and potential other) events provided. Thus, the change in the number and potential impact of larger and more frequent events and their associated impacts to the immediate area has not been described, analyzed or assessed in any way, rendering the environmental analysis in the MND inadequate and incomplete.

In my opinion, there is a reasonable probability that the project would result in a significant environmental impact. The project may result in a substantial, or potentially substantial, adverse change in the environment due to parking and traffic impacts. If the school district wants to pursue the project as proposed, the district should prepare an EIR.

Please let me know if you have any questions about these comments on the MND for the Monterey High School Athletic Field Improvements.

Yours truly,

Christina E. McGinnis (via e-mail)

Christina E. McGinnis