



October 6, 2016

Richard James
EMC Planning Group
301 Lighthouse Avenue,
Monterey, CA 93940

**SUBJECT: Comments on the Subsequent Environmental Impact Report for the
Salinas Union High School District New Middle School #5 Construction**

Dear Mr. James:

The Transportation Agency for Monterey County is the Regional Transportation Planning and Congestion Management Agency for Monterey County, and agency staff has reviewed the Subsequent Environmental Impact Report for the Salinas Union High School District New Middle School #5 Construction.

The Salinas Union High School District is proposing the construction and operation of a new middle school approximately 1,500 feet northeast of the intersection of Hemingway Drive and Boronda Road, north of the City limits of Salinas ("proposed project" or "project"). The new middle school would accommodate between 800 and 1,000 seventh and eighth grade students. The new middle school is anticipated to have a range of 40-50 employees based on the school district's classroom loading and target student population numbers. The 18-acre project site is located northeast of the corner of Boronda Road and Natividad Road in the City of Salinas ("City") within the County of Monterey ("County").

The Transportation Agency offers the following comments:

Impacts to Local and Regional Roads

1. Both the Project and the Project Alternatives would result in impacts to the local and regional transportation system. The Transportation Agency supports the developer's intention to pay the City of Salinas's traffic impact fees, as well as the Regional Development Impact Fee as mitigation for the project's regional impacts.

Safe Routes to School

2. The Transportation Agency supports the project's intention to implement safe routes to schools elements in the design of the project, including that sidewalks would be constructed along all of the project site frontages on K Street, AA Street, and AJ Street. Additionally, the Agency supports that efforts be taken to enhance and

connect to the already existing bicycle safe routes to school elements within the City to the project. Specifically, a fully separated bicycle and pedestrian pathway, Class I, or sidewalks and buffered bikeways, Class IV, should be considered as a connection from the project to the City's existing bicycle and pedestrian network.

Alternative Analysis

3. The SEIR concludes that the environmentally superior alternative would be the No Project/No New Middle School alternative. This alternative would also have the fewest transportation and traffic impacts since students and staff would remain at existing facilities within the district.

However, the discussion of the No Project/No New Middle School alternative assumes that no improvements would be made to existing facilities, and, therefore, the project goals, such as reducing overcrowding, would not be met. This assumption, and subsequent analysis, does not consider the district's ability to enhance and remodel existing facilities to achieve the project's goals. Recent examples for other local school districts, such as the Alisal Elementary School District and the Soledad Unified School District, show that remodeling and enhancing existing school facilities can achieve the same goals, such as reducing overcrowding, as building a new facility.

Given that the No Project/No New Middle School alternative is listed as having equal or fewer transportation and air quality impacts than the proposed site (as noted in Table 21 on page 6-16), TAMC encourages the district to consider the feasibility of the No Project/No New Middle School alternative to meet the project's goals by enhancing existing facilities to accommodate the student population.

Additionally, to the extent that the No Project/No New Middle School alternative would lead to a potential increase in traffic impacts at existing schools, those impacts could potentially be mitigated through the implementation of ridesharing, busing, and safe routes to schools strategies for existing schools, which TAMC can assist the district with implementing.

Location and Future Growth

4. The project would be located on existing agricultural lands that are included as part of the City of Salinas' Future Growth Area in the General Plan. Due to this designation, the SEIR concludes that the project would not be growth inducing. However, the timeline for development of the Future Growth Area is uncertain and dependent on conditions that are subject to change unexpectedly, such as economic conditions and the demand for new housing within the city.

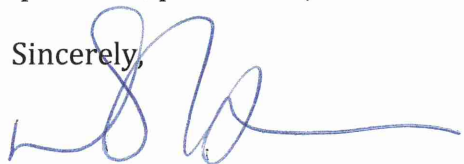
Development of the project prior to development of the Future Growth Area, therefore, has the potential to result in a school that is surrounded by agricultural lands, that is difficult to access for children, parents, and staff who might want to walk or ride a bike to school. This pattern of school development is common in Monterey County and North Salinas, as are the resulting transportation problems. Consequently, development of the project at the proposed location, prior to

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development of the Future Growth Area, has the potential to result in greater traffic impacts than waiting to be developed in concurrence with the development of the Future Growth Area, or the No Project/No New Middle School alternative. .

Thank you for the opportunity to comment on the proposed project. If you have any questions, please contact Grant Leonard of my staff at 831-775-0903.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Debra L. Hale', with a long horizontal flourish extending to the right.

Debra L. Hale
Executive Director