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MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY

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COPY



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October 16, 2015

MS PRISCILLA WALTON, PRESIDENT
CARMEL VALLEY ASSOCIATION
PO BOX 157
CARMEL VALLEY CA 93924

SUBJECT: GUIDE FOR THE PREPARATION OF TRAFFIC IMPACT STUDIES

Dear Ms. Walton,

Thank you for your letter expressing concerns about the changes to the Guide for the Preparation of Traffic Impact Studies (Guide). Monterey County Resource Management Agency – Public Works (RMA-PW) prepared this document as a reference for use by consultants preparing traffic impact studies for review by Monterey County staff. The Guide does not establish any threshold for the purposes of California Environmental Quality Act (CEQA). The CEQA thresholds used in the Environmental Impact Report (EIR) for the project are based on the Monterey County General Plan which includes the Carmel Valley Master Plan (CVMP). These plans have had significant participation and review by the public and were approved by the Board of Supervisors.

For the Carmel Valley Area, County policy can be found in Carmel Valley Master Plan (CVMP) section CV-2.17 (f), copied below:

- f) The traffic standards (LOS as measured by peak hour conditions) for the CVMP Area shall be as follows:*
Monterey County General Plan Carmel Valley Master Plan October 26, 2010 – Amended as of February 12, 2013 Page, CVMP-10
- 1) Signalized Intersections – LOS of "C" is the acceptable condition.*
 - 2) Unsignalized Intersections – LOS of "F" or meeting of any traffic signal warrant are defined as unacceptable conditions.*
 - 3) Carmel Valley Road Segment Operations:*
 - a) LOS of "C" and ADT below its threshold specified in Policy CV-2.17(a) for Segments 1, 2, 8, 9, 10, 11, 12 and 13 is an acceptable condition;*
 - b) LOS of "D" and ADT below its threshold specified in Policy CV-2.17(a) for Segments 3, 4, 5, 6, and 7 is an Acceptable condition.*

During review of development applications that require a discretionary permit, if traffic analysis of the proposed project indicates that the project would result in traffic conditions that would exceed the standards described above in Policy CV 2.17(f), after the analysis takes into

consideration the Carmel Valley Traffic Improvement Program to be funded by the Carmel Valley Road Traffic Mitigation Fee, then approval of the project shall be conditioned on the prior (e.g., prior to project-generated traffic) construction of additional roadway improvements or an Environmental Impact Report shall be prepared for the project, which will include evaluation of traffic impacts based on the ADT methodology. Such additional roadway improvements must be sufficient, when combined with the projects programmed for completion prior to the project generated traffic in the Carmel Valley Traffic Improvement Program, to allow County to find that the affected roadway segments or intersections would meet the acceptable standard upon completion of the programmed plus additional improvements. Any EIR required by this policy shall assess cumulative traffic impacts outside the CVMP area arising from development within the CVMP area.

*This policy does not apply to the first single family residence on a legal lot of record. The use of the ADT methodology as set forth in this Policy CV-2.17 shall be limited to the purposes described in the Policy, and the County may utilize any traffic evaluation methodology it deems appropriate for other purposes, including but not limited to, road and intersection design. This policy shall also not apply to commercial development in any Light Commercial Zoning ("LC") district within the CVMP area where the Director of Planning has determined that the requirement for a General Development Plan, or amendment to a General Development Plan, may be waived pursuant to Monterey County Code section 21.18.030 (E).
(Amended by Board Resolution 13-029)*

The Draft EIR uses this policy as the basis of its traffic analysis and the final EIR clarified that this policy was used. In addition, as part of the final EIR, Joe Fernandez, P.E., wrote a memo titled "Transportation Errata – Carmel Canine Sports Center DEIR" to address an issue that had been raised as part of the comment process on the draft EIR. The issue was the original language in the Traffic Study indicated that the threshold for a deficient unsignalized intersection was a Level of Service (LOS) of F and meeting a traffic signal warrant which is in conflict with the language in the CVMP. The corrected language reads as; "*project traffic is added to an intersection operating at LOS F or a signal warrant is met.*" As indicated in the referenced memo this correction does not change the significance analysis in the EIR.

The purpose of the County's Guide is to provide clear expectations to applicants and their consultants as to what a traffic study needs to include in order for it to be considered complete by the RMA-PW. It does not set CEQA thresholds. The 2003 Guide referenced a standard that was inconsistent with the 2010 General Plan or the CVMP. Accordingly, it needed to be updated to be consistent with the controlling General Plan, as reflected in the 2014 Guide.

The original 2003 document was based on the Caltrans document: "Guide for the Preparation of Traffic Impact Studies." When preparing the revision to the Guide, Staff intended to streamline the document by removing information that had been superseded by the approval of the General Plan and removing items that could be misleading or cause confusion. A summary of your specific concerns and the reasoning Staff had for changing them are included below:

- **2003 Guide Appendix B Methodology for Calculating Equitable Mitigation Measures**

The 2003 Appendix B provided one possible means for determination of the rough proportionality of the costs to implement a mitigation measure. At the beginning of Appendix B, the 2003 Guide states that "*the methodology below is neither intended as, nor does it establish, a legal standard for determining equitable responsibility and cost of a projects traffic impact.*" Staff felt that the inclusion of this in the 2010 version of the

Guide could lead the reader to assume that this method was preferred or endorsed by the County, and it was removed as a result.

- **2003 Guide appendix C-1 Measures of Effectiveness by Facility Type**

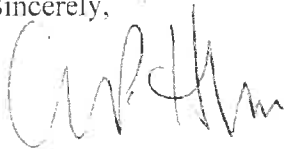
This section was in conflict with the approved General plan and CVMP and was superseded by them. In updating the appendix, staff felt it was appropriate to leave the Measures of Effectiveness out and refer applicants and their consultants to the General Plan or CVMP for this information. Appendix C-2 was removed for the same reason.

- **2003 Guide appendix D-1 Traffic Impact Studies Definitions**

These definitions were removed since they did not necessarily reflect the language and policies in the 2010 General Plan.

Thank you for your time and please contact Monterey County Traffic Engineer, Ryan Chapman, if you have any questions. He can be reached at chapmanr@co.monterey.ca.us or at (831) 796-3009.

Sincerely,



Carl P. Holm, AICP
RMA Director

cc: Dr. Lew Bauman, County Administrative Officer
Robert K. Murdoch, Director of Public Works
Mike Novo, Director of Planning
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David Mack, Associate Planner
Tim Sanders, Traffic Chair of the Carmel Valley Association
Janet Brennan, Chair of Carmel Valley Land Use Advisory Committee

