Attachment L

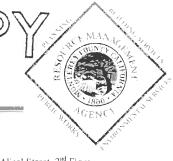


MONTEREY COUNTY

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October 16, 2015

TIMOTHY D SANDERS 25075 PINE HILLS DR CARMEL CA 93923

SUBJECT: CARMEL CANINE SPORTS CENTER

Dear Mr. Sanders,

The Director of Planning has forwarded me your letter dated September 24, 2015 regarding the Carmel Canine Sports Center. Your letter makes several claims that I would like to address. I have included a brief summary of your original point in italics prior to the section that addresses your claim.

Prior to discussing the specific claims of your letter, it is important to discuss the relationship between the Highway Capacity Manual (HCM) and the Carmel Valley Master Plan (CVMP) when evaluating traffic impacts for specific projects. The CVMP is the Board approved plan that establishes policies used for determining how to evaluate traffic. It defines what is acceptable and what is not. The HCM is the tool that is used most frequently to quantify the potential benefits or impacts of a proposal for comparison against the policy, although it is not the only tool that is used.

You make the claim that the DEIR [Draft Environmental Impact Report] is wrong in asserting that all of the "study intersections are operating at an acceptable LOS." The DEIR evaluates the intersection level of service (LOS) for all the study intersection on Table 4.12-2. All of the intersection LOS's are within the policy established by the County through the first portion of Policy CV –2.17 (f), which provides, in pertinent part, as follows:

- f) The traffic standards (LOS as measured by peak hour conditions) for the CVMP Area shall be as follows:
- 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.

(Monterey County General Plan, Carmel Valley Master Plan (adopted October 26, 2010 and amended February 12, 2013) at p. CVMP-10.)

Based on this language, the acceptable LOS for any unsignalized intersection is an intersection LOS of E or better. Therefore, the statement in the DEIR is right.

You make the claim that the DEIR is wrong in evaluating the intersection LOS due to the fact that the HCM does not provide a means to do so. I agree that the HCM does not provide a means to calculate the LOS for an intersection as a whole which is what is required under CVMP 2.17 (f), above.

Since there is no way to use the HCM methodologies to calculate an intersection LOS as is required by the CVMP, an average intersection delay was calculated by taking the average of all vehicle delays during the study period and equating this value to the appropriate LOS using Table 19-1 in the HCM. In this case, Joe Fernandez, P.E., the engineer that prepared this traffic study used Synchro to calculate the intersection delay which is reported on the first line of the Valley Greens Drive & Carmel Valley road LOS sheets in Appendix B of the Traffic Study. This provides a LOS value that is consistent with the LOS values for all-way stop intersections and roundabouts. In addition, delay in seconds per vehicle is also used in the HCM methodologies for calculating a LOS for signalized intersections.

This approach is used by other agencies in California to calculate an intersection LOS for comparison to a standard, and I would consider it the best possible approach to identifying an intersection LOS for a Two-Way Stop Control (TWSC) intersection. In order to provide as much information as possible, the traffic study does report the worst approach LOS and delay in seconds per vehicle in addition to the average intersection delay, and the delays for all approaches are reported in appendix B of the Traffic Study.

You provide calculations summarizing the data provided from the traffic study for approach LOS. The data that you have presented came from the traffic study of the EIR and represents the worst approach delay for the intersection of CVR and Valley Greens Drive/Tehema under various scenarios. These data are not the intersection LOS required to be evaluated by the CVMP and are not representative of the intersection operation as a whole. In addition, you have calculated a "multiple of LOS F" value. This value has no relation to any metric that I am aware of and assumes a linear correlation between LOS and delay. Based on a review of any of the intersection LOS tables in the HCM these relationships are not linear, and as such, the data provided with your conclusion leads to the misinterpretation that somehow the level at which the intersection is operating at is overcapacity.

Another issue raised by your letter was with the reporting of the language of the CVMP threshold in the DEIR. The issue was that the original language in the Traffic Study indicated that the threshold for a deficient unsignalized intersection was a LOS of F and meeting a traffic signal warrant which is in conflict with the language in the CVMP. This language was in error and was corrected in the final EIR by a memo titled "Transportation Errata – Carmel Canine Sports Center DEIR" written by Joe Fernandez, PE. (See p. J-624 of the FEIR.) There was no intention to change the language as written in the CVMP which is the governing policy for evaluating traffic impacts in this location. As indicated in the Fernandez memo, the corrected threshold did not change the findings of the DEIR.

Another concern that you raised relates to changes to the "Traffic Studies Guide." I have attached a letter that was sent to the Carmel Valley Association (CVA) discussing this issue at length. This

document was never intended to be used to establish thresholds for Monterey County but to establish consistency in the quality of traffic studies that staff receives from outside sources.

If you have any questions or comments, please let me know. I can be contacted at 831-796-3009 or by e-mail at chapmanr@co.monterey.ca.us.

Sincerely,

Ryan D. Chapman Traffic Engineer

cc: Dr. Lew Bauman, County Administrative Officer

Carl P. Holm, RMA Director

Robert K. Murdoch, Director of Public Works

Mike Novo, Director of Planning

David Mack, Associate Planner

Tim Sanders, Traffic Chair of the Carmel Valley Association

Janet Brennan, Chair of Carmel Valley Land Use Advisory Committee