

Attachment D
Draft Addendum No. 1

Amendments to the
2010 Monterey County
General Plan
(Carmel Valley Master Plan)
REF1200079

ATTACHMENT D

Addendum No. 1 to Final Environmental Impact Report #07-01, SCH #2007121001 Pursuant to California Environmental Quality Act Guidelines Article 11, Section 15164

2010 MONTEREY COUNTY GENERAL PLAN/CARMEL VALLEY MASTER PLAN Planning File No. REF120079 Amendment of General Plan/Camel Valley Master Plan

1. Introduction

On October 26, 2010, by Resolution Nos. 10-290 and 10-291 the Monterey County Board of Supervisors certified Final Environmental Impact Report #07-01, SCH #2007121001 ("FEIR"), and adopted findings, a Statement of Overriding Considerations, a Mitigation Monitoring and Reporting Program, and the 2010 Monterey County General Plan ("General Plan), including the Carmel Valley Master Plan ("CVMP"). As part of a settlement of litigation regarding the adoption of the General Plan and CVMP, and certification of the FEIR, amendments to CVMP Policies CV-1.6 (relating to the new residential unit cap in the CVMP area), CV-2.17 (relating to traffic counting methodology along Carmel Valley Road), CV-2.18 (relating to the Carmel Valley Road Committee), CV-3.11 (relating to tree protection), and CV-3.22 and 6.5 (relating to non-agricultural development on slopes) are being considered. The proposed amendments are set forth and discussed in Attachments A and B to the staff report for this matter.

This technical addendum has been prepared pursuant to Article 11, Section 15164 of the California Environmental Quality Act guidelines ("Guidelines") to make minor technical changes to the project analyzed in the FEIR. None of the conditions described in Guidelines Section 15162 or 15163, calling for preparation of a subsequent EIR or supplement to an EIR, have occurred.

2. Scope and Purpose of this Addendum

This Addendum No. 1 describes whether any changes or additions are necessary to the FEIR as a result of the proposed amendments to the General Plan/CVMP, or if any of the conditions described in Guidelines Section 15162 exist. Please see the attached memoranda from ICF International, incorporated herein by reference, that assesses the potential environmental impacts from the adoption of the proposed amendments, and whether any changes to the FEIR are required.

3. Conclusion

As the ICF memoranda disclose, the proposed changes to the CVMP Policies will not result in additional impacts or an increase in the severity of impacts; the identification of feasible mitigation measures or alternatives that were previously identified as infeasible; or the identification of considerably different mitigation measures or alternatives than those disclosed or discussed in the FEIR. Accordingly, none of the conditions described in Guidelines Section 15162, requiring a Subsequent EIR, exist. This Addendum No. 1 is considered sufficient because it discloses the proposed amendments to the CVMP Policies, and provides an analysis regarding the lack of environmental impacts.

FEIR #07-01 has been included as an attachment to the staff report and is available on the County's web site at
http://www.co.monterey.ca.us/planning/qpu/GPU_2007/FEIR_Information/FEIR_Information.htm.



TO: Mike Novo, Monterey County Planning Director

FROM: Rich Walter, ICF International

CC: Les Girard, Monterey County Counsel
Terry Rivasplata, ICF International

DATE: November 5, 2012

RE: Potential Changes to Monterey County 2010 Carmel Valley Master Plan Policies

This memorandum presents ICF's review of the potential CEQA implications of potential changes to Monterey County 2010 Carmel Valley Master Plan (CVMP) policies concerning development potential, traffic, tree removal, and development of slopes. ICF also reviewed an Addendum (Addendum No. 2) to the final EIR prepared by the County for the 2010 General Plan prepared concerning the proposed policy changes to the CVMP.

Our review is limited to the potential for changes in environmental impacts due to policy changes relevant to the impacts disclosed in the certified EIR for the 2010 General Plan. Our review is based on our understanding of CEQA, the General Plan/CVMP and the General Plan EIR. Our review does not constitute legal advice.

A prior Addendum (Addendum No. 1) was also prepared by the County concerning certain proposed changes in Public Services policies. That addendum does not concern issues addressed in this memo.

Policy CV-1.6 - Potential Policy Changes Regarding Development Potential

The proposed changes include the following: (1) limiting new residential subdivision units to 190, which is a reduction in buildout potential from 266 units; and (2) addition of clarifying language about accessory units and how the term "units" is defined.

The reduction in buildout level in the CVMP area will result in slightly lower environmental impacts of buildout within the CVMP area. Relative to the CVMP area, the reduction in environmental impact would not result in any new significant impacts or substantial more severe impacts than those disclosed in the 2010 GP EIR. In theory, if housing demand is fixed at any point in time then the reduction in allowable units in CVMP will make it slightly more likely that development would occur in locations outside CVMP for any fixed point in time. However, the change does not increase the allowable units in any other part of the County and thus the 76 units eliminated in the CVMP

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would not be added to buildout totals in other parts of the County. As such, no new impacts in areas at buildout outside the CVMP buildout above those disclosed in the 2010 GP EIR would be expected. In theory, one could argue that traffic levels (and development) outside the CVMP could be higher in the interim between the present and buildout due to the accommodation of the 76 units (or some portion thereof) in other parts of the County. However, it would be speculative to attempt to identify exactly where these 76 units (or portion thereof) might be distributed. Given the limited amount of units, this is unlikely to substantially change traffic conditions or environmental impacts in the interim on a County-level scale compared to that disclosed in the 2010 GP EIR.

Regarding the clarifying language replacing the term “auxiliary unit” with the term “accessory dwelling unit” and the clarifying language regarding defining the term “units” in Policy CV-1.6, the proposed edits only clarify the intent of the prior language, neither increasing nor decreasing the development potential of the policy. As such, there is no increase in environmental impact due to these proposed clarifications compared to the environmental impacts disclosed in the 2010 GP EIR.

Policy CV-2.17 - Potential Policy Changes Concerning Traffic

The proposed changes include the following:

- Splitting of Rio Road monitoring segment into two segments: 1) from Rio Road at its eastern terminus to Carmel Rancho Blvd. and 2) between Carmel Rancho Blvd and SR1;
- addition of requirement for traffic analysis using the Average Daily Traffic (ADT) methodology, new ADT threshold triggers for evaluation and additional monitoring; new ADT traffic standards;
- mandating of use of the PTSF methodology;
- change of peak hour “trigger” for monitoring roadways from 10 or less peak trips in favor of 1% of the PTSF value necessary to cause a decrease in LOS;
- addition of requirement to annually establish PTSF or other methodology thresholds;
- addition of requirement for ADT analysis in EIRs for new development and analysis of cumulative traffic impacts outside the CVMP from development within the CVMP area; and
- exclusion of application of Policy CV-2.17 to commercial development in any light commercial zoning where a requirement for General Development Plan or amendment may be waived pursuant to Monterey County Code section 21.18.030(E).

Addition of ADT Fixed Volume Thresholds/Standards

The fundamental change proposed is the addition and application of thresholds, triggers, and standards using fixed ADT volumes. The specific fixed ADT volumes for Carmel Valley Road are those derived using the ADT approach to determine the existing capacity of the roadways as they are designed presently. Use of a fixed ADT volume threshold eliminates the ability to take into account any future capacity improvements including additional lanes or new passing lanes.

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As shown in the attached tables, current conditions are under the proposed new ADT standards for 2005, 2008, 2009, 2010 and 2011 traffic volumes with one exception (Segment 7 exceeded the ADT threshold in 2005). The 2010 GP EIR identified that cumulative 2030 traffic conditions would exceed the LOS standards in CV-2.17 for Carmel Valley Road Segments 5, 6 and 7 using the LOS standards based on PTSF methodology. The 2010 GP EIR concluded that impacts to Segments 5, 6 and 7 could be mitigated to a less than significant level by mitigation included in the proposed CVTIP, which consisted of adding passing lanes to these segments. Using the ADT fixed volume LOS standards included in the proposed settlement agreement, 2030 cumulative traffic conditions could exceed the ADT standards for Carmel Valley Road Segments 2, 3, 4, 5, 6 and 7 (as well as Segment 10 if the 2-lane standard is applied to the 4-lane roadway). The actual traffic amounts would not change (and may be slightly less due to the reduction to 190 new subdivision units), however if the ADT fixed volume standards were used as the CEQA significance thresholds, then there would be new significant impacts to Carmel Valley Road Segments 2, 3 and 4 (and possibly Segment 10). The significance would result from the addition of new significance thresholds, not a substantial change in actual traffic or physical impact. The County has identified to ICF that the ADT thresholds in the policy are not intended to be used as CEQA thresholds for either future projects or for the traffic analysis for the 2010 General Plan EIR and thus that the thresholds used in the prior General Plan EIR remain unchanged. As such, since the policy revisions would not increase traffic (and may actually lower it slightly), they would not result in an increase of actual physical environmental impacts compared to those disclosed in the 2010 General Plan EIR.

As shown in the attached Table 2, based on a projection forward from 2011 conditions to predicted 2030 conditions, Segment 7 may exceed its ADT fixed volume threshold as soon as 2015 following by Segments 3, 4, 5 and 6 by perhaps around 2020. There are practically no options in the CVMP area for building new diversionary roads that could route traffic away from roadways that exceed their ADT threshold and adding roadway capacity will not reduce volumes. Thus the use of the ADT standard eliminates the ability to mitigate traffic impacts short of denying permits to projects that generate new trips above the ADT threshold. This will have a substantial impact on CEQA compliance for all discretionary approvals that result in new trips for projects other than light commercial projects for which an exclusion is provided in the policy revision. Thus, starting perhaps as soon as 2015, the approval of any discretionary project that contributes trips to the road system would require preparation and consideration of an EIR.

The proposed ADT fixed volume threshold/standard of 27,839 for Segment 10 (Carmel Rancho Blvd. to SR1) is inconsistent with the other thresholds and should be clarified. For example, the threshold for Segment 9 is 51,401. It appears that the proposed Segment 10 threshold is for two-lanes only but this is not clarified anywhere in the new policy. It is likely that this threshold is an old ADT threshold from before this segment was expanded to 4 lanes. It would be clearer to establish a 4-lane threshold for Segment 10 than the proposed 2-lane threshold.

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Monitoring Trigger Changes

The proposed changes do not eliminate the existing CV-2.17 required monitoring or use of PTSF triggers or standards, but change the trigger for public hearing from 10 peak trips to 1% of the PTSF value that would cause a decrease in LOS. We did not analyze what the 1% PTSF trigger would mean in terms of volumes; thus this change could be more or less stringent than the prior trigger. As the trigger only requires a public hearing and not actual action, this change would not result in more environmental impacts than disclosed in the 2010 GP EIR.

The proposed changes add an 80 percent of ADT volume threshold trigger for converting five-year monitoring into annual monitoring for a particular segment. As of 2011, Segments 3, 4, 5, 6, 7 and 8 have exceeded this threshold and thus annual monitoring will be required for these segments, which is an addition of one segment (Segment 8) over that required by existing policy. It should be noted that Segment 10 is at 79% of its ADT threshold in 2011 (and was over the threshold in 2005, 2008 and 2009) and will likely exceed its threshold shortly, triggering annual monitoring for this segment as well. Additional annual monitoring does not result in any environmental impact greater than that disclosed in the 2010 GP EIR.

Mandating PTSF Methodology

The existing policy requires monitoring and reporting using both ADT and PTSF methodology. Revised Policy CV-2.17b specified use of PTSF methodology or other methodologies determined appropriate by Public Works, leaving it open to use of other accepted methodologies. However, revised Policy CV-2.17c specified the use of a PTSF trigger for public hearings. This was probably an oversight. It is recommended that no reference be made to use of PTSF in the policy. It is suggested that references to non-ADT methodologies should be to a "professionally accepted traffic analysis methodology as determined by the Public Works Department" instead. This would allow change over time to reflect changes over time in professional practice.

Splitting of Rio Road into Two Segments

The existing Policy CV-2.17 included Rio Road between Carmel Rancho Blvd. and SR1, but the proposed policy changes would split this road into two segments by adding a new segment from Val Verde Road to Carmel Rancho Blvd. Traffic along this segment would be affected by new development, if approved, along Val Verde Drive and/or at Rancho Canada Village. It is unclear where the 6,416 fixed volume ADT threshold was derived from, since this segment was never included in prior CVMP traffic segments (the focus on Rio Road was always west of Carmel Rancho Blvd.). In the traffic study included in the Draft EIR for Rancho Canada Village (Hexagon Transportation Consultants 2007), the predicted future volumes with Rancho Canada Village (281 units) if access westward to Rio Road would be approximately 3,200 ADT (assuming 10 times predicted PM peak levels) compared to approximately 1,000 ADT at present. As the proposed changes limit overall new subdivision units to 190, of which 24 are reserved for the Delfino property, the maximum units that could be allowed at Rancho Canada Village (or a combination of

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Rancho Canada village and development along Val Verde Drive) would be 166 units. Assuming a proportional reduction in traffic from 281 units to 166 units, then with project-volumes would be less than that above. At any rate, it would appear that future volumes with Rancho Canada Village may be well below the proposed ADT standard of 6,416 for Rio Road west of Val Verde Drive.

However, as noted above, cumulative traffic along certain segments of Carmel Valley Road will likely exceed the proposed ADT fixed volume standards perhaps as soon as 2015; thus any CEQA documents for Rancho Canada Village or other development projects would need to disclose potential contributions to cumulative traffic impacts, which are likely to be found significant and unavoidable and require preparation of an EIR and adoption of a statement of overriding considerations.

Exclusion for Light Commercial Development

The exclusion of application of Policy CV-2.17 to commercial development in any light commercial zoned area where a requirement for General Development Plan or amendment may be waived pursuant to Monterey County Code section 21.18.030(E) would not result in new traffic impacts over those disclosed in the 2010 GP EIR because Section 21.18.030(E) states that a waiver can only be provided if there are no potential significant adverse impacts from the proposed development. Thus any such development would still need to be assessed for traffic impacts in order to support the finding in Section 21.18.030 (E), but would not necessarily need to use the LOS standards and methodology in the revised Policy CV-2.17. This leaves open the possibility that such development could be analyzed using standard HCM methodologies instead of the ADT methodology proposed for all other development.

Policy CV-2.18 - Potential Policy Changes Concerning Traffic

The proposed changes include the following:

- addition of requirement that the Carmel Valley Road Committee to review and comment on proposed projects in the CVTIP and the annual monitoring reports; and
- addition of a requirement that the Carmel Valley Road Committee comment on the PSR for the CVTIP.

The addition of requirements that the committee comment on the CVTIP, monitoring reports, or the PSR would not change impacts in CVMP in regards to traffic or any other impact. The requirements are only that the committee is to comment; the changes do not make the committee the decision-maker for deciding what projects are included in the CVTIP which remains the County.

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Policy CV-3.11 - Potential Policy Changes Concerning Tree Removal

The proposed changes include the following:

- required permit for removal of healthy native oak, madrone, and redwood trees in the CVMP area;
- required replacement by one-gallon or greater nursery-grown trees where feasible;
- adds a minimum fine for violations;
- allows for emergency exemptions; and
- exempts tree removal where specified in CPUC General Order No. 95 and by government agencies.

The changes are more specific than the existing policy and more stringent by mandating a permit, replacement, and establishing fines. Essentially, the changed policy provides the detail that would have been expected from the ordinance called for in existing policy. The emergency and government agency exemptions were called for in existing policy. A utility exemption was not called out in the existing policy, but is a specification of state CPUC regulations and thus would have applied in any case. As such, the revisions regarding tree removal would not result in any new significant or substantially more severe environmental impacts than that disclosed in the 2010 GP EIR.

Policy CV-3.22 and CV-6.5 - Potential Policy Changes Concerning Development on Slopes

The proposed changes include the following:

- deletes CV-6.5 and replaces with new policy CV-3.22 that narrows slope prohibition to “non-agricultural” development instead of “new development; and
- provides that non-agricultural development on slopes above 25% that is not on highly erodible soils is subject to General Plan OS-3.5(1).

The existing policy CV-6.5 was not intended to refer to agriculture when it referred to development; thus the new language clarifying that the policy applies to “non-agricultural” development does not limit the development potential as it was understood at the time of the 2010 GP EIR. Since the existing policy CV-6.5 only applied to slopes that both had highly erodible soils and were in excess of 25%, the reference to development on slopes of greater than 25% without highly erodible soils being subject to General Plan Policy OS-3.5(1) is only a clarification. Agricultural conversions will remain subject to General Plan Policy OS-3.5(2). As such, the revisions regarding development on slopes would not result in any new significant or substantially more severe environmental impacts than that disclosed in the 2010 GP EIR.

Table 1: Comparison of Settlement Agreement ADT Standards to Actual Counts (2006 - 2010)												
Seg #	Carmel Valley Road Segment	Standard ADT	Capacity ADT	2005 ADT	2008 ADT	2009 ADT	2010 ADT	2011 ADT	2011 percent of Standard			
1	East of Holman Rd.	8,487	9,600	3,774	3,235	2,966	3,050	2,932	35%			
2	Holman Road to Esquiline Road	6,835	9,600	4,260	3,673	3,323	3,441	3,338	49%			
3	Esquiline Road to Ford Road	9,065	11,680	6,651	6,658	6,011	7,930	7,766	88%			
4	Ford Road to Laureles Grade	11,600	11,680	11,689	10,608	10,543	10,421	10,328	89%			
5	Laureles Grade to Robinson Canyon Road (1)	12,752	11,680	11,739	11,621	10,924	10,815	10,855	85%			
6	Robinson Canyon Road to Schulte Road	15,489	14,600	14,736	14,163	13,757	13,442	13,519	87%			
7	Schulte Road to Rancho San Carlos Road	16,340	11,680	21,010	15,884	15,532	15,242	15,308	94%			
8	Rancho San Carlos Road to Rio Road	48,487	14,600	21,010	19,655	19,532	19,634	18,964	39%			
9	Rio Road to Carmel Rancho Blvd.	51,401	30,900	25,484	24,655	24,265	23,645	23,602	46%			
10	Carmel Rancho Blvd. to SR-1	27,839 (2)	30,900	23,647	23,160	22,416	21,839	22,034	79%			
11	Carmel Rancho Blvd between CVR and Rio Road	33,465	N/A	N/A	11,015	9,616	9,486	9,205	28%			
12	Rio Road between Val Verde and Carmel Rancho	6,418	N/A	N/A	N/A	N/A	N/A	820	13%			
13	Rio Road between Carmel Rancho and SR1	33,928	N/A	N/A	12,270	11,289	10,990	10,963	32%			
Bold = Exceeds Standard				Mont. County 2006				Mont. County 2011				Calculated

Notes:
 (1) KHA studied Laureles Grade to Miramonte Road and Miramonte Road to Robinson Canyon Road. Results are shown for Miramonte Road to Robinson Canyon Road which had higher volumes.
 (2) Threshold is for 2-lanes

Sources:
 Kimley-Horn Associates, 2008. Traffic Analysis of Carmel Valley Road. Unpublished data.
 DKS Associates, 2007. Carmel Valley Master Plan Traffic Study. July. Released as Appendix F to Carmel Valley Traffic Improvement Program Draft Subsequent EIR, August 2007.
 Monterey County, 2011, 2012. Annual Monitoring Data for Carmel Valley to 2008, 2009, 2010 and 2012

Table 2: Comparison of Settlement Agreement ADT Standards to predicted 2030 Conditions

Seq #	Carmel Valley Road Segment	Type of Roadway	Standard			2011 Conditions			2030 Cumulative (KH 2008)			2030 Cumulative (DKS 2007)		
			ADT	ADT	% of Standard	ADT	Capacity	ADT	% of Standard	ADT (1)	2-way PM peak	Year > STD	ADT (1)	Year > STD
1	East of Holman Road	2-Lane (Undivided)	8,497	2,932	54%	9,600	4,600	54%	6,790	679	2038	6,790	2038	
2	Holman Road to Escudilla Road	2-Lane (Undivided)	6,895	3,938	57%	11,680	4,500	68%	10,230	721	2038	10,230	2038	
3	Escudilla Road to Ford Road	2-Lane (Undivided)	9,065	7,766	86%	11,680	4,500	68%	10,230	721	2038	10,230	2038	
4	Ford Road to Laureles Grade	2-Lane (Undivided)	11,600	10,328	89%	11,680	4,500	68%	10,230	721	2038	10,230	2038	
5	Laureles Grade to Robinson Canyon Rd (2)	2-Lane (Undivided)	12,762	10,855	85%	11,680	4,500	68%	10,230	721	2038	10,230	2038	
6	Robinson Canyon Rd to Schulte Road	2-Lane (Undivided)	19,499	13,519	69%	11,680	4,500	68%	10,230	721	2038	10,230	2038	
7	Schulte Road to Rancho San Carlos Road	2-Lane (Undivided)	16,449	13,308	81%	11,680	4,500	68%	10,230	721	2038	10,230	2038	
8	Rancho San Carlos Rd to Rio Road	4-Lane (Divided)	48,187	18,984	39%	30,900	29,400	95%	28,250	2,625	2088	28,250	2088	
9	Rio Road to Carmel Rancho Blvd	4-Lane (Divided)	51,407	23,502	46%	30,900	29,400	95%	28,250	2,625	2088	28,250	2088	
10	Carmel Rancho Blvd to SR-1	4-Lane (Divided)	27,839 (3)	22,094	79%	30,900	29,400	95%	28,250	2,625	2088	28,250	2088	
11	Carmel Rancho Blvd between CVR and Rio Road	4-Lane (Divided)	33,465	9,205	28%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
12	Rio Road between Val Verde and Carmel Rancho	2-Lane (Undivided)	5,415	820	15%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
13	Rio Road between Carmel Rancho and SR1	4-Lane (Divided and Undivided)	33,928	10,963	32%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

Notes:
 (1) DKS did not estimate average daily volumes. Rough calculation of 10 lines PM peak volume may overestimate or underestimate 2030 volumes.
 (2) KHA studied Laureles Grade to Miramonte Road and Miramonte Road to Robinson Canyon Road. Results are shown for Miramonte Road to Robinson Canyon Road which had higher volumes.
 (3) Threshold is for 2 lanes

Sources:
 Kinley-Horn Associates, 2008. Traffic Analysis of Carmel Valley Road. Unpublished data.
 DKS Associates, 2007. Carmel Valley Master Plan Traffic Study, July. Released as Appendix F to Carmel Valley Traffic Improvement Program Draft Subsequent EIR, August 2007.
 Monterey County, 2012, 2011 Annual Monitoring Report for CVR.

Seq #	Standard	2011 Conditions	2030 Cumulative (KH 2008)	2030 Cumulative (DKS 2007)	2-way PM peak	Year > STD	ADT (1)	Year > STD
	Sellment	Monterey County, 2012	KHA 2008	Calculated	DKS 2007	Calculated	Calculated as 10 X peak	Calculated



**ATTORNEY-CLIENT PRIVILEGE
PRELIMINARY/WORK IN PROGRESS**

TO: Mike Novo, Monterey County Planning Director

FROM: Rich Walter, ICF International

CC: Les Girard, Monterey County Counsel
Terry Rivasplata, ICF International

DATE: November 20, 2012

**RE: Potential Changes to Monterey County 2010 Carmel Valley Master Plan Policies
concerning Road Monitoring Locations**

This memorandum presents ICF's review of the potential CEQA implications of potential changes to Monterey County 2010 Carmel Valley Master Plan (CVMP) policies concerning road monitoring segments. Our review is limited to the potential for changes in environmental impacts due to policy changes relevant to the impacts disclosed in the certified EIR for the 2010 General Plan. Our review is based on our understanding of CEQA, the General Plan/CVMP and the General Plan EIR. Our review does not constitute legal advice.

Policy CV-2.17 - Potential Policy Changes Concerning Traffic Monitoring

The proposed changes include the following:

- No annual monitoring of Rio Road
- Addition of annual monitoring of Segment 10 (Carmel Valley Road between Carmel Rancho And SR1)

The 2010 CVMP Policy CV-2.17 included annual monitoring of Rio Road between Val Verde Drive and SR1. The deletion of annual monitoring for this segment would not cause any increase in traffic levels or change traffic conditions. The revised Policy 2.17 will still require periodic (5-year) monitoring of all segments and annual monitoring where any segment is within 20% of its ADT threshold. As a result, annual monitoring will still be required before a roadway reaches identified thresholds. As this proposed change would not actually change environmental conditions, there would be no change in environmental impacts disclosed in the prior 2010 GP EIR.

The 2010 CVMP Policy CV-2.17 did not include annual monitoring of Carmel Valley between Carmel Rancho Blvd. and SR1. The addition of annual monitoring for this segment would not cause any increase in traffic levels or change traffic conditions. Thus, this proposed change would not result in any change in environmental impacts disclosed in the prior 2010 GP EIR.