

AD HOC CARMEL VALLEY TRAFFIC COMMITTEE

January 30, 2009

Monterey County  
Planning and Building  
Inspection Administration

Mike Novo  
County of Monterey  
Salinas, CA  
Via electronic mail: [novom@co.monterey.ca.us](mailto:novom@co.monterey.ca.us)

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Dear Mr. Novo,

1. **Background.** On October 29, 2008, the Carmel Valley Blue Ribbon Road Committee met under the chairmanship of Supervisor Dave Potter to discuss the DEIR/GPU5 implications for Carmel Valley, including the potential lifting of the subdivision moratorium (BOS Resolution 02-024). Because of the considerable public interest in these issues, Supervisor Potter asked that the four of us constitute an ad hoc group to summarize the public's concerns and questions, and to meet with Supervisor Potter regarding them. On December 8, 2008, we met with Supervisor Potter and County Staff to discuss these issues. Supervisor Potter and staff recommended that we memorialize our concerns as a response to the DEIR of GPU-5. The following is our response. We ask that you respond to each of these issues by doing all necessary and appropriate research to answer each concern fully and clearly. Thank you.
2. **Buildout numbers/266 cap.** Future development will have a direct impact on traffic levels in Carmel Valley, yet we find inconsistencies in the buildout numbers for Carmel Valley analyzed in the DEIR. It is our understanding that the 266 cap was developed by subtracting approved and unbuilt subdivisions, built and unbuilt single family dwelling and adjunct units, and vacant lots of record from the CVMP cap of 1,310 units and lots (p. 9 CVMP). We would like to confirm that the 266 cap is consistent with the overall cap of 1,310 and includes both units and existing lots. To avoid confusion after GPU5 is adopted, the specific projects and dwelling units that constitute approved and unbuilt subdivisions, residential and adjunct units should be identified in a table similar such as that found in Appendix 1. Regarding the 2092 buildout number of 1,148 new units, we understand how the 390 new units for the Carmel Mid-Valley AHO were derived. However, we do not understand how 758 new units were calculated given the cap in the CVMP of 266 new units/lots. Please explain.
3. **Missing Traffic Data.** The DEIR is missing important traffic data from Carmel Valley that are essential to drawing sound conclusions. These data are available for other parts of Monterey County. Please explain why the following data are missing and please provide them: full data for all segments of County Road G16 (Carmel Valley Road) from SR-1 to Via Los Tulares, and for SR-1 from Carpenter Street to Riley Ranch Road, all of which are missing from Tables A, B and C of Appendix C (Traffic).

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4. **Unclear LOS Standard.** The CVMP sets the LOS standard at “C.” Judge Richard Silver ruled clearly in 1987 that CVMP 39.3.2.1 sets the LOS at C: “COUNTY acknowledged and agreed to the clarification [that] LOS C is the traffic standard adopted by the COUNTY in the Carmel Valley Master Plan. It is a goal to be achieved over the life of the plan.” [*emphasis in original*]. GPU5 also establishes the LOS standard at “C” (CV-2.12). Yet, the DEIR establishes LOS lower than C as a standard. Why? The DEIR is also internally inconsistent in identifying LOS by segment, and is inconsistent with other county studies of LOS in Carmel Valley, including the CVTIP. Please see Appendix 2 as an example of this inconsistency. Please explain these inconsistencies. Lowering the LOS standard has the added disadvantage of allowing even greater levels of traffic in the future. For example, if an ADT standard is changed from LOS C to LOS D, the change creates an opening for a 50% increase in traffic; from D to E creates an opening for a 100% increase; from C to E creates a 300% opening. Please see Appendix 3 for an example on Segment 7 of increased traffic potential due to declining LOS standards. Please explain if this is correct and, if so, what the full impacts on Carmel Valley will be from this diminished LOS. 4
  
5. **Different Standard Used for Carmel Valley.** Circulation studies for the rest of Monterey County use the ADT standard for measuring actual LOS levels. Only in Carmel Valley is the peak hour PTSF (percent of time spent following) used. Why? The argument given on page 4.6-9 of the DEIR is both factually incorrect (i.e., ADT is explicitly the standard used in the CVMP) and misleading (e.g., conflation of different items in the annual CVR monitoring reports and the CVTIP). Is this correct, and, if so, what are the full impact on Carmel Valley? Use of the peak hour PTSF standard lessens traffic impacts by comparisons to the ADT standard (in the bureaucratic language of the DEIR, it “overcomes ... impact over-estimation”), thus making it appear that Carmel Valley’s traffic is relatively less than it actually is, by comparison to the rest of the county. Is this correct? If the ADT standard is used instead, what will be the full impacts on Carmel Valley? Please provide these data. 5
  
6. **BOSR 02-024 and Capacity Improvements on Highway One.** BOSR 02-024 is explicit that the subdivision moratorium may be lifted only after “the construction of capacity-increasing improvements to State Highway 1 between its intersections with Carmel Valley Road and Morse Drive. . .” No such capacity-increasing improvements have been built and none will be built under GPU5. Yet, GPU5 and its DEIR essentially ignore BOSR 02-024 and its conditions for removal in the development plans for Carmel Valley. Why? The conditions imposed by BOSR 02-024 should be centrally featured in both documents. Please recalculate the full traffic impacts on Carmel Valley if BOSR 02-024 remains in place for the duration of the General Plan. Please explain why BOSR 02-024 is noted only marginally in the DEIR as though it may not be around during the life of the General Plan. 6
  
7. **Policy Considerations.** It is the sense of our group that the following recommendations are widely shared in Carmel Valley, reflect the wishes of our community, and should be made clear by Board action. Please comment on each of these recommendations and explain their impacts if adopted in the General Plan. 7

- That a single, permanent traffic standard of LOS C be established for Carmel Valley Road in clear, unequivocal terms. In reporting by the County, LOS C values should be reported quantitatively as well as by letter grade; the quantitative measure should be ADT/LOS C, where LOS C refers to the numerical upper bound of ADT in the LOS C category; this ratio will be  $\leq 1$  if the LOS C criterion is met,  $>1$  if not.
- That ADT be used as the appropriate choice of measurement of LOS.
- That when a segment of Carmel Valley Road drops below LOS C, then development beyond existing legal lots of record in that segment area should cease until mitigations are put in place that result in an LOS of C. We believe that in some cases mitigations may be inconsistent with preserving the rural nature of Carmel Valley and thus undesirable. Those decisions should be made on a case-by-case basis in consultation with the Carmel Valley Road Committee and the Carmel Valley Land Use Advisory Committee.
- That Board Resolution 02-024 be enshrined as permanent policy.
- That all policies in the CVMP, including those related to Carmel Valley Road, should reflect the principal planning function of *preventing* the overloading of infrastructure facilities. The difficulty and costs of recovery from overburdened facilities far exceed those of prevention, and should be avoided.

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Thank you.

Sincerely,

Janet Brennan  
Margaret Robbins  
Glenn Robinson  
Tim Sanders

**APPENDIX 1: BUILD OUT NUMBERS FOR CARMEL VALLEY**

<b>CATEGORY</b>	<b>UNITS</b>	<b>SOURCE</b>
Approved Subdivisions Unbuilt – 1987-1998	140	p. 231 Land Use Forecasting methodology, CV Traffic Study
Approved Subdivisions Unbuilt -- 1998-2006	152	p. 231
Approved SFDS/Adjunct unbuilt – 1987-1998	379.5	Table 5, CV Traffic Study
Approved SFDS/Adjunct Unbuilt	75.5	p. 231, Table 4
Vacant lots of record/other	38.5	
Total	1044.0	
Cap	1310.0	
Remaining	266	
<i>Please correct any errors in this chart and cite your source.</i>		

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**APPENDIX 2: INCONSISTENT LOS FOR CARMEL VALLEY ROAD**

The following table illustrates, through a few recent examples, the difficulties in making sense of the meaning of LOS as variously interpreted and reported. DEIR here refers to the GPU5 DEIR, and TIPDSEIR refers to the Traffic Improvement Program DSEIR. Please correct any errors in this chart.

**Examples of Inconsistencies in LOS for Carmel Valley Road**

CVR segment	CVMP standard	"acceptable" DEIR p. 4.6-62	DEIR Tbl 4.6-21, "Existing"	"current" DEIR Tbl 4.6-5	TIPDSEIR Tbl 6 Append F	CVMP monitor 3-yr avg
3 [2B]	C	D	D	C/B	C/B	
4 [3]	C	D	E	C	C	C--
5	C	D	E/F	D/C	D	C-
6	C	D	F	D	D	C-
7	C	D	F	D	D	D
8	C	C	F	A	A	B
9	C	C	D	B/A	B/A	B
10	C	C	D	B/A	B/A	B

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**APPENDIX 3: EXTENT OF EXPOSURE TO GREATER TRAFFIC BY LOWERING THE LOS STANDARD (SEGMENT 7).**

**Contributions to ADT from Increasing LOS Segment 7**

