

Appendix A

Notice of Preparation and Comment Letters

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Carmel Properties Company (Rio Ranch Market Place)

Lead Agency: Monterey County Contact Person: David J. R. Mack, AICP
Mailing Address: 1441 Schilling Place Phone: (831) 755-5096
City: Salinas Zip: 93901 County: Monterey

Project Location: County: Monterey City/Nearest Community: Carmel
Cross Streets: Rio Road and Carmel Center Place Zip Code:
Longitude/Latitude (degrees, minutes and seconds): ° ' " N / ° ' " W Total Acres: 3.77
Assessor's Parcel No.: 009-562-002, 015, & 016 Section: Twp.: Range: Base:
Within 2 Miles: State Hwy #: Highway 1 Waterways: Carmel River
Airports: Railways: Schools: Carmel River Elem., Jun

Document Type:

- | | | | |
|---|--|------------------------------------|--|
| CEQA: <input checked="" type="checkbox"/> NOP | <input type="checkbox"/> Draft EIR | NEPA: <input type="checkbox"/> NOI | Other: <input type="checkbox"/> Joint Document |
| <input type="checkbox"/> Early Cons | <input type="checkbox"/> Supplement/Subsequent EIR | <input type="checkbox"/> EA | <input type="checkbox"/> Final Document |
| <input type="checkbox"/> Neg Dec | (Prior SCH No.) | <input type="checkbox"/> Draft EIS | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Mit Neg Dec | Other: | <input type="checkbox"/> FONSI | |

Local Action Type:

- | | | | |
|---|---|--|---|
| <input type="checkbox"/> General Plan Update | <input type="checkbox"/> Specific Plan | <input type="checkbox"/> Rezone | <input type="checkbox"/> Annexation |
| <input type="checkbox"/> General Plan Amendment | <input type="checkbox"/> Master Plan | <input type="checkbox"/> Prezone | <input type="checkbox"/> Redevelopment |
| <input type="checkbox"/> General Plan Element | <input type="checkbox"/> Planned Unit Development | <input checked="" type="checkbox"/> Use Permit | <input type="checkbox"/> Coastal Permit |
| <input type="checkbox"/> Community Plan | <input checked="" type="checkbox"/> Site Plan | <input type="checkbox"/> Land Division (Subdivision, etc.) | <input type="checkbox"/> Other: |

Development Type:

- | | |
|--|--|
| <input type="checkbox"/> Residential: Units _____ Acres _____ | <input type="checkbox"/> Transportation: Type _____ |
| <input type="checkbox"/> Office: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Mining: Mineral _____ |
| <input checked="" type="checkbox"/> Commercial: Sq.ft. 42,310 Acres 3.77 Employees _____ | <input type="checkbox"/> Power: Type _____ MW _____ |
| <input type="checkbox"/> Industrial: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Waste Treatment: Type _____ MGD _____ |
| <input type="checkbox"/> Educational: _____ | <input type="checkbox"/> Hazardous Waste: Type _____ |
| <input type="checkbox"/> Recreational: _____ | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Water Facilities: Type _____ MGD _____ | |

Project Issues Discussed in Document:

- | | | | |
|--|--|---|--|
| <input checked="" type="checkbox"/> Aesthetic/Visual | <input type="checkbox"/> Fiscal | <input checked="" type="checkbox"/> Recreation/Parks | <input checked="" type="checkbox"/> Vegetation |
| <input type="checkbox"/> Agricultural Land | <input checked="" type="checkbox"/> Flood Plain/Flooding | <input type="checkbox"/> Schools/Universities | <input checked="" type="checkbox"/> Water Quality |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Forest Land/Fire Hazard | <input type="checkbox"/> Septic Systems | <input checked="" type="checkbox"/> Water Supply/Groundwater |
| <input checked="" type="checkbox"/> Archeological/Historical | <input checked="" type="checkbox"/> Geologic/Seismic | <input checked="" type="checkbox"/> Sewer Capacity | <input checked="" type="checkbox"/> Wetland/Riparian |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Minerals | <input checked="" type="checkbox"/> Soil Erosion/Compaction/Grading | <input type="checkbox"/> Growth Inducement |
| <input type="checkbox"/> Coastal Zone | <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Solid Waste | <input checked="" type="checkbox"/> Land Use |
| <input checked="" type="checkbox"/> Drainage/Absorption | <input type="checkbox"/> Population/Housing Balance | <input checked="" type="checkbox"/> Toxic/Hazardous | <input checked="" type="checkbox"/> Cumulative Effects |
| <input type="checkbox"/> Economic/Jobs | <input checked="" type="checkbox"/> Public Services/Facilities | <input checked="" type="checkbox"/> Traffic/Circulation | <input checked="" type="checkbox"/> Other: Climate Change |

Present Land Use/Zoning/General Plan Designation:

Commercial land use designation; LC-D-S-RAZ zoning

Project Description: (please use a separate page if necessary)

The project consists of a commercial development on a 3.77-acre undeveloped infill site. The project would consist of a retail marketplace development, including four buildings and two farm sheds, totaling 42,310 square feet. Potential uses of the four buildings would include a specialty grocer, retail shops, restaurants, cafes, and consumer-oriented professional services; and the farm sheds would include casual food and beverage service, and seasonal merchants. The project would require an Administrative Permit and Design Approval for development in the "S" (Site Control) and "D" (Design Control) zoning districts.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

- Air Resources Board
- Boating & Waterways, Department of
- California Emergency Management Agency
- California Highway Patrol
- Caltrans District #5
- Caltrans Division of Aeronautics
- Caltrans Planning
- Central Valley Flood Protection Board
- Coachella Valley Mtns. Conservancy
- Coastal Commission
- Colorado River Board
- Conservation, Department of
- Corrections, Department of
- Delta Protection Commission
- Education, Department of
- Energy Commission
- Fish & Game Region #4
- Food & Agriculture, Department of
- Forestry and Fire Protection, Department of
- General Services, Department of
- Health Services, Department of
- Housing & Community Development
- Native American Heritage Commission

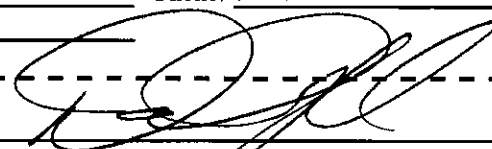
- Office of Historic Preservation
- Office of Public School Construction
- Parks & Recreation, Department of
- Pesticide Regulation, Department of
- Public Utilities Commission
- Regional WQCB #
- Resources Agency
- Resources Recycling and Recovery, Department of
- S.F. Bay Conservation & Development Comm.
- San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
- San Joaquin River Conservancy
- Santa Monica Mtns. Conservancy
- State Lands Commission
- SWRCB: Clean Water Grants
- SWRCB: Water Quality
- SWRCB: Water Rights
- Tahoe Regional Planning Agency
- Toxic Substances Control, Department of
- Water Resources, Department of
- Other: _____
- Other: _____

Local Public Review Period (to be filled in by lead agency)

Starting Date July 27, 2017 Ending Date August 28, 2017

Lead Agency (Complete if applicable):

Consulting Firm: <u>Rincon Consultants</u>	Applicant: <u>Foothill Partners</u>
Address: <u>437 Figueroa Street, Ste. 203</u>	Address: <u>1121 White Rock Road, Suite 205</u>
City/State/Zip: <u>Monterey, CA 93940</u>	City/State/Zip: <u>El Dorado Hills, CA 95762</u>
Contact: <u>Christy Sabdo, AICP</u>	Phone: <u>(915) 939-9890</u>
Phone: <u>(831) 920-5423</u>	

Signature of Lead Agency Representative:  Date: 7/21/17

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

NOTICE OF PREPARATION

To: Responsible Agencies/Interested Parties

From: Brandon Swanson, RMA - Planning Manager
David J. R. Mack, AICP, Senior Planner
Monterey County Resource Management Agency – Planning Department

SUBJECT: **Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Application Planning File Number: PLN150668**

The County of Monterey will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the Combined Development Permit and a General Development Plan application for development of the Rio Ranch Marketplace Project (Planning File Number: PLN150668). The 3.8-acre project site is located at 3705 Rio Road and is currently zoned Light Commercial, Design Control, Site Plan Review, and Residential Allocation Zoning (LC-D-S-RAZ), subject to site development standards within the LC District. The project proposed by Foothill Partners would consist of retail marketplace development consisting of four buildings and two farm sheds totaling 42,310 square feet. Potential uses of the four buildings, allowed under the LC District, would include a specialty grocer, retail shops, restaurants, cafes, and consumer-oriented professional services; the farm sheds would include casual food and beverage service and seasonal merchants. The project would require a Combined Development Permit, including a Use Permit for Light Commercial uses, Administrative Permit for development in the “S” (Site Control) district, and Design Approval for development “D” (Design Control) zoning district, in addition to a General Development Plan; and Lot Line Adjustment. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency’s statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials.

Due to time limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice between July 27, 2017 and August 28, 2017.

Please submit your response to the address shown above. We will need the name for a contact person in your agency.

Sincerely,

/S/ David J. R. Mack, AICP, Senior Planner
831-755-5096

Attachments: Project Description and Vicinity Map

PROJECT LOCATION

The project site is located at 3705 Rio Road, approximately 375 feet southeast of Highway 1 at the Carmel Center Place and Rio Road three-way stop, within the Carmel Valley Master Plan Area, in Carmel Valley, Monterey County, CA. The project site is comprised of three parcels (Assessor's Parcel Numbers [APN] 009-562-002, 009-562-015, & 009-562-016).

The project site is bordered by the Chevron Gas Station to the west, by the Carmel Mission Inn to the north, by professional offices and mixed-use professional office/residential to the east, and by the Crossroads Shopping Center to the south, which is anchored by a grocery store and drugstore, south of Rio Road.

PROJECT DESCRIPTION

The project applicant is requesting a Combined Development Permit and General Development Plan consisting of: (1) Use Permit to allow 42,310 square feet of commercial development on a 3.77-acre undeveloped infill site; and (2) Administrative Permit and Design Approval for development in the "S" (Site Review) and "D" (Design Review) Zoning District; and Lot Line Adjustment.

The project would allow for the development of a new retail center anchored by a specialty grocery store and complementary commercial uses to provide shopping alternatives in a high-quality shopping environment.

Proposed site plans for the marketplace include five buildings that vary in size and architectural design to keep with the uniqueness of the area. Table 1 below shows these five proposed buildings.

Table 1 Proposed Project Buildings

Building Location	Square Footage (SF)	Height	Potential Occupant(s)
Grocer	23,000	One Floor	Specialty grocery store
Store A	8,335	One Floor	Small retail shops, restaurants and cafes, and consumer-oriented professional services
Store B-1	5,475	One Floor	Small retail shops, restaurants and cafes, and consumer-oriented professional services
Store B-2	5,000	Partial Second Floor	Small retail shops, restaurants and cafes, and consumer-oriented professional services
Farm Sheds (2)	500	n/a	Casual food and beverage service, seasonal merchants
Project Total	42,310 sq. ft.		

Note: On the Site Plan summary table, the 41,810 SF Gross Leasable Area does not include the two farm sheds.

Continuity of architectural design is intentionally avoided across the breadth of the project. The applicant intends that the project not appear as a typical suburban shopping center, but rather as a part of the larger mouth of the Carmel Valley commercial business district. As such, the design theme for the grocer and Store A building is rural agricultural-industrial architecture, reflecting the agricultural nature of the Carmel Valley. The design theme for Store B-2 buildings is traditional Carmel Village Spanish revival architecture. The design theme for the Farm Sheds is a classic, simple pole barn form.

Plant species in landscaped areas of the project would consist of a combination of California native and drought tolerant, adaptive species. There are four planting areas in the project landscaping: stormwater detention swales; perimeter and streetscape planting; parking islands; and pedestrian seating areas.

The current access point to the project site at Rio Road and Carmel Center Place would be eliminated. The primary vehicular access to the project would be a reconfigured traffic-signal controlled intersection at Rio

Road and Crossroads Boulevard. The existing four-way intersection would be expanded to a four-way intersection by the addition of the project main entrance across from Crossroads Boulevard. Two secondary vehicular access points would be provide: a driveway off Rio Road that is shared with the adjacent Carmel Mission Inn; and a new driveway connecting with the adjacent Barnyard Shopping Center and to Clocktower Lane to the north. Pedestrian access to the site would be provided by the replacement of sidewalks and ADA compliant improvements. On-site pedestrian circulation would be provided by walkways; and bicycle racks/lockers would be installed.

Water service to the site would be provided via a water transfer from the California American Water Company (Cal-Am) and a water purchase acquired from the Malpasso Water Company LLC. The applicant would apply for a water transfer through the California American Water Company using water credits from the underlying property and the adjacent Carmel Mission Inn. In addition, the applicant has applied to the Malpasso Water Company, LLC to request 2.5 acre-feet per year of water entitlements. Wastewater service would be provided via connection to the Carmel Area Wastewater District (CAWD). A letter confirming capacity was submitted to Monterey County. Landscape irrigation is designed to use non-potable water and would be distributed through a water efficient, subsurface irrigation system.

POTENTIAL ENVIRONMENTAL EFFECTS

Air Quality, Biological Resources, Climate Change, Cultural and Paleontological Resources, Geology and Soils, Hydrology and Water Quality, Noise, and Transportation and Traffic.

cc: State Clearinghouse, Office of Planning and Research
1400 Tenth Street, Room 212
P.O. Box 3044
Sacramento, CA 95812-3044

Figure 1 Project Location



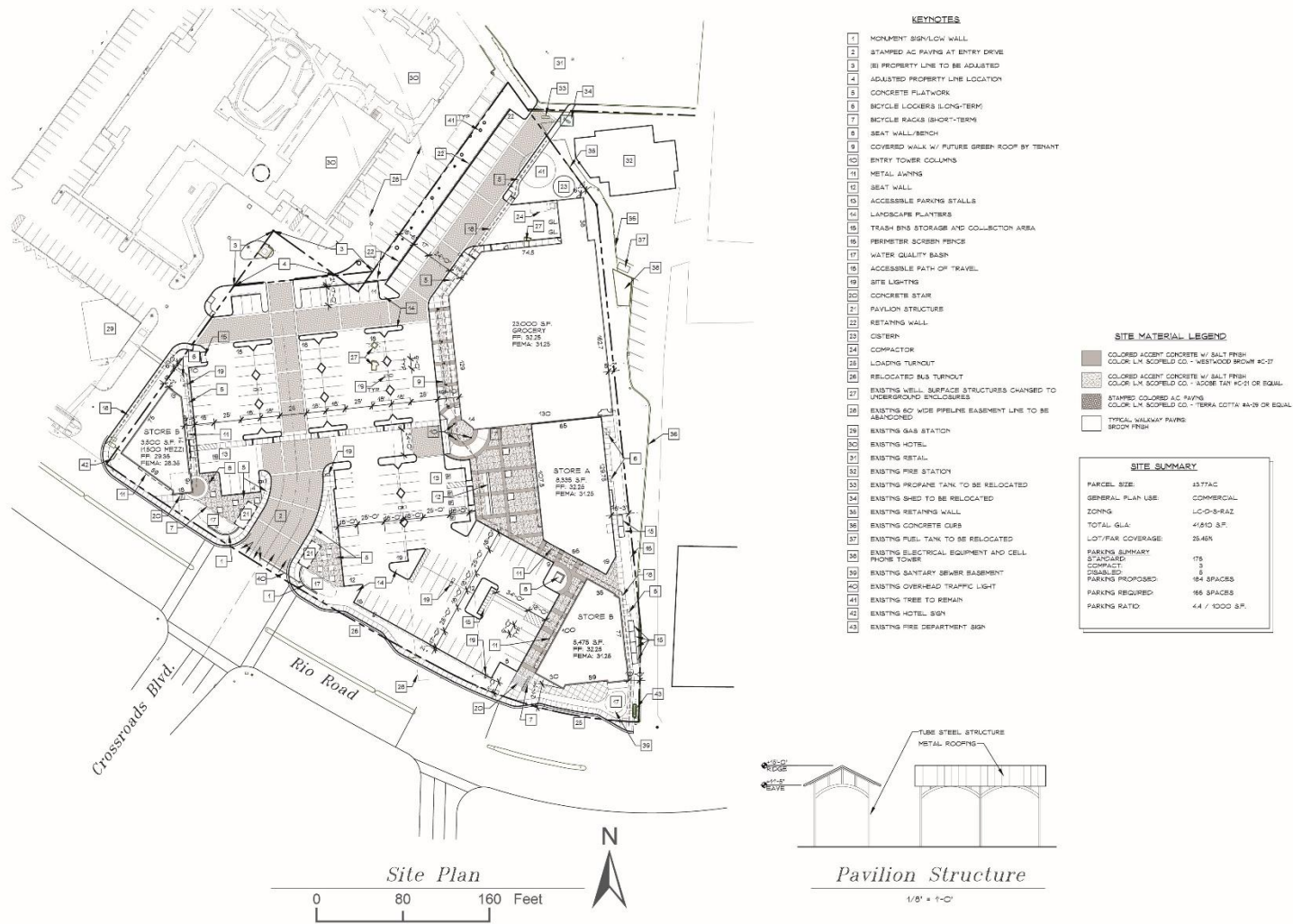
Imagery provided by ESRI and its licensors © 2017.

 Project Location 



Fig 1 Regional Location

Figure 2 Site Plan



Source: Perkins, Williams & Cotterill Architects, November 2016.

DEPARTMENT OF TRANSPORTATION

50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3101
FAX (805) 549-3329
TTY 711
<http://www.dot.ca.gov/dist05/>



*Making Conservation
a California Way of Life.*

August 28, 2017

MON 1 72.612
SCH#2017071058

David J.R. Mack, Senior Planner
Monterey County
1441 Schilling Place
Salinas, CA 93901

**COMMENTS TO CARMEL PROPERTIES COMPANY (RIO RANCH MARKET PLACE)
NOTICE OF PREPARATION (NOP)**

Dear Mr. Mack:

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the above referenced project and offers the following comments.

1. Caltrans supports local planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel.
2. To ensure the traffic study in the Draft EIR includes the information needed to analyze the impacts (both cumulative and project-specific) of this effort, it is recommended that the analysis be prepared in accordance with the Department's *"Guide for the Preparation of Traffic Impact Studies."* An alternative methodology that produces technically comparable results can also be used.
3. The traffic study should include information on existing traffic volumes within the study area, including the State transportation system, and should be based on recent traffic volumes less than two years old. Counts older than two years cannot be used as a baseline.

If you have any questions, or need further clarification on items discussed above, please contact me at (805) 549-3432 or Jenna.Schudson@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jenna Schudson".

Jenna Schudson
Transportation Planner
Development Review Coordinator
District 5, LD-IGR South Branch



Carmel Valley Association

preserving the beauty, resources, and rural character of the Valley since 1949

08/20/2017

To: Brandon Swanson, RMA- Planning Manager
David J.R. Mack, Monterey County Resource Management Agency

CC: Carl Holm, Jacquelin Onciano, Mary Adams

In response to the Notice of Preparation of a Draft Environmental Impact Report (undated; received approximately August 3, 2017) for PLN150668 (called Rio Ranch Marketplace Project), the Carmel Valley Association provides the comments that follow, pertaining to CEQA's requirement for baseline data on "physical environment conditions in the vicinity of the project, as they exist."

A Draft Environmental Impact Report is an informational document intended to provide substantial evidence, "based to the extent possible on scientific and factual data" concerning a project's environmental effects, in order to "inform public agency decision-makers and the public generally." In order to facilitate objectivity and the achievement of the "adequacy, completeness, and good faith effort at full disclosure" that CEQA demands.

General Plan (including CVMP) traffic standards for Monterey County are stated in terms of LOS and its underlying measures of effectiveness (e.g., vehicle volume per unit time, delay, PTSF), and the comments below are stated so as to provide consistency of the plan and with the County's Guide for the Preparation of Traffic Impact Studies. If there is any confusion or conflict between the standards implied by our comments that follow and the standards or approaches applied to this project, possibly related to SB 743 or other considerations, we ask to be informed in a timely way so that public participation as mandated by CEQA can be fully exercised.

Sincerely,

Pris Walton, President CVA

Date: August 20, 2017

**Re: Notice of Preparation (NOP) of DEIR for PLN150668
(Rio Ranch Marketplace Project)
Transportation and Traffic portion**

MAIL P.O. Box 157, Carmel Valley, CA 93924

WEB www.carmelvalleyassociation.org | EMAIL president@carmelvalleyassociation.org

In response to the NOP (undated, but apparently released July 27, 2017) referred to above, the Carmel Valley Association requests that the DEIR contain the following at a minimum:

Traffic Measurement, Data Acquisition and Reporting

1. Segments: Complete time-labeled vehicle count data for existing traffic, at 15-minute intervals, during least one full and continuous 7-day week when public schools are in session, for
 - Highway 1 between Fern Canyon Road (on the south) and the most northerly entrance ramp to Highway 1 from Munras Avenue
 - Rio Road between its eastern terminus and Atherton Dr.
 - Carmel Valley Road, segments 1 through 10 (western terminus at Highway 1 through Carmel Valley Village)
 - Carmel Rancho Blvd. between Carmel Valley Road and Rio Road
 - Crossroads Blvd between Rio Road and CVS store
 - Carmel Center Place between Rio Road and southern terminus
2. Intersections: Complete time-labeled existing vehicle count and intersection delay data for existing traffic, at 15-minute intervals, during least one full and continuous 7-day week when public schools are in session, for
 - All intersections on Highway 1 between the most northerly ramp to/from Munras Avenue and Fern Canyon Road (on the south).
 - Intersections of Rio Road with
 - Crossroads Blvd.
 - Carmel Center Dr.
 - Via Nona Marie
 - Carmel Rancho Blvd.
 - Intersections of Carmel Valley Rd. with
 - Carmel Rancho Blvd.
 - Carmel Middle School
 - Via Mallorca
 - Rancho San Carlos Rd.
 - Valley Greens Dr.
 - Dorris Dr.
 - Berwick Dr.
 - Laureles Grade Rd.
 - Boronda Rd.
3. Data format: Excel spreadsheet, providing accessibility for analysis by the public:
 - a. Raw data
 - b. EIR data analyses

Analysis of data and determination of environmental significance for EIR

All analyses are to be carried out in terms of rural two- and four-lane highways as appropriate (e.g., as described in HCM); no analysis may be in terms of urban streets or other non-rural descriptions.

1. Principal quantitative variables

a. For segments

- i. 24-hour volume (a.k.a. ADT or AADT): maximum daily vehicle volume during the continuous 7-day measurement interval
 - Day and date identified
 - Unit: vehicles per day
- ii. Peak hour vehicle volume
 - Hour, day and date identified; highest and second-highest peak, with values in two units tabulated
 - vehicles per hour
 - average inter-vehicle headway in seconds (= sec/vehicle pair = (3600 sec/hr)/(vehicles per hour))
- iii. PTSF
 - As mandated in CVMP
 - As required, and normally used, for analysis of the southbound lane of Highway 1 between Ocean Avenue and Carmel Valley Road, and
 - Ancillary data needed to clarify “standard” PTSF reports (e.g., HCS 2010) as described below
- iv. Other variables, units and time identifications in addition to those listed above, as may be required for accurate description and representation of traffic on relevant two- and four-lane rural road or highway segments

b. For intersections

- i. Signalized intersections: Control delay and v/c as prescribed in Highway Capacity Manual (HCM)
- ii. Unsignalized intersections: Maximum delay times for worst-approaches during intersection peak hours, and intersection v/c (volume-to-capacity ratio). **Note** that for two-way stop-controlled (TWSC) intersections HCM2010 states that “LOS [level of service] is not defined for the intersection as a whole or for major-street approaches” (page 19-1); thus intersection average, or intersection-as-a whole, or major approach delays are irrelevant, for the reasons given on p. 19-1 of HCM2010, and should not be reported as significant data in EIR summaries or conclusions. Assigning LOS letters to such data is falsification of data,

since no LOS value is defined; the LOS assignments provided Exhibit 19-1 are for “minor street movement”.

- c. **Excluded:** The following list cautions against repetition of known local abuses of the EIR process and of CEQA. It enumerates misleading and unacceptable elements and practices that have appeared in recent County EIRS. Canons of good practice and local experience both dictates that they should not appear in the proposed EIR. That is, in the EIR under preparation there should appear:
- i. No proxies or substitutes or alternates for actually observed vehicle counts and/or delays (e.g., proportions of left-turn lanes and mandated stops on a length of roadway, as utilized in MMLoS) may be included in the EIR analysis. (Rancho Canada RDEIR; Val Verde DEIR by Central Coast Transportation Consultants (CCTC))
 - ii. No redefinition of segments of Highway 1 as an Urban Street to gain access to less rigorous traffic criteria. (Villas de Carmelo EIR by Higgins; Rancho Canada Village by CCTC)
 - iii. No data-creation, such as constructing directional traffic volumes from previously acquired County two-way data, by assuming 60%-40% AM splits and 40%-60% PM splits, and presenting the results as if valid measurements. (Carmel Canine Sports Center initial traffic study by Hexagon)
 - iv. No use, in unsignalized intersection analyses, of overall or average or major-approach intersection delays; they are unauthorized under HCM protocols and methods. They have no defined LOS because they are misleading and not useful, as HCM2010 explains in detail (p. 19-1). (Carmel Canine Sports Center EIR by CCTC; Rancho Canada Village EIR by CCTC)
 - v. No use of LOS-assignment tables that not intended to apply to the variables being considered, as, for example, use of *minor-approach* delay vs. LOS tables in purporting to “evaluate” LOS associated with *major-approach*, or overall or average intersection delays. (Carmel Canine Sports Center EIR by CCTC; Rancho Canada Village EIR by CCTC)
 - vi. No substitution (“referencing”) of improper or inadequate studies in other (previous) EIRs, thereby escaping direct scrutiny in the present EIR of the defective analyses the referenced EIR may contain, and thereby “doubling down” on erroneous claims that potentially violate CEQA, whether or not the “referenced” project EIR has been certified, or the project approved, or is in litigation. (Val Verde project EIR by CCTC, substituting the “referenced” Rancho Canada Village EIR study results for its own study)

- vii. No use of analytical programs or methods that assume roadway or traffic characteristics that are *not* present in the circumstances under study; for example, modes of transportation not present or forbidden on the roadway (e.g., pedestrian, bicycle, or transit, as in MMLoS applied to Highway 1). (Val Verde project EIR by CCTC; Rancho Canada Village EIR by CCTC)

2. Significance Criteria; Thresholds of Significance

- a. All *variables* used in determining significant impact should be determined and specified before the acquisition of data.
- b. All *criteria* for determining significant impact should be determined and specified before the acquisition of data. Thresholds of significance are identical with values of variables at which service becomes “unacceptable” in plan documents.
- c. No time “windows” (e.g., 7 AM - 9AM) should confine the analysis of data; for example, periods of peak traffic are determined by the traffic volume data itself, indeed are part of the observed data, and are not predictable *a priori*.

3. Major Principles

Although the *Carmel Valley Master Plan*, the *2010 General Plan*, and the *Monterey County Guide for the Preparation of Traffic Impact Studies* couch traffic standards in terms of LOS (level of service), there are many definitions of LOS; it is a broad concept that includes, in practice, a somewhat incoherent collection of distinct and even contradictory quantitative and subjective standards. To help resolve ambiguities and insure meaningful analyses, the following principles are to be followed in the EIR:

- a. All variables and criteria for significant impact
 - o Are to represent current (within two years) actually observed traffic volumes and delays, and
 - o Are to be assessed quantitatively in terms of predetermined, known, published, widely recognized and widely available numerical standards.
- b. In order to clarify the meaning and utility of PTSF as environmental significance criterion, all PTSF tabulations in the EIR are to include (whether or not the software or protocols applied to the cases require or report them)
 - o Time and date of data acquisition (in addition to any specification of time of data analysis)
 - o Total two-way peak traffic volume (in addition to any directional volumes otherwise specified) in the data on which the PTSF value is based
 - o The value of v/c (volume to capacity ratio) for the relevant segment
 - o *If the threshold of significance – i.e., threshold of unacceptable condition – has not been reached: The total volume at which the traffic on the relevant segment would produce a significant impact using PTSF criteria*
- c. All peak hour volumes, both segment and intersection, should be tabulated, and the tabulation should include the value of v/c.

- d. Whenever $v/c > 1$, it should be noted explicitly in tables that the roadway element is rated LOS F, and should be stated prominently in the text that “any increase during peak hour (one vehicle) is considered significant”.



August 25, 2017

David Mack
Senior Planner
Monterey County Resource Management Agency

SUBJECT: Comments on the Notice of Preparation for the Rio Ranch Marketplace Project

Dear Mr. Mack:

The Transportation Agency for Monterey County is the Regional Transportation Planning and Congestion Management Agency for Monterey County. Agency staff has reviewed the Notice of Preparation for the Rio Ranch Marketplace Project and offers the following comments:

1. The Agency supports the development of a detailed Traffic Impact Analysis to inform the EIR about the impacts to local and regional road networks.
2. The Agency support the early inclusion and consideration for active transportation strategies in the development of projects, including those noted in the NOP.
3. Consideration should be given to the installation of electric vehicle charging stations, as new construction provides an opportunity to install this needed infrastructure.
4. The Agency supports the use of Intersections Control Evaluations (ICE analysis) when major modifications to intersections are considered.
5. The Agency looks forward to providing comments on the draft environmental impact report.

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,

Debra L. Hale
Executive Director