



March 21, 2007

Mr. Brian Roseth
Planning Services Manager
City of Carmel-by-the-Sea
Community Planning and Building
P.O. Drawer G,
Carmel-by-the-Sea, California 93921

**SUBJECT: Comments on Mitigated Negative Declaration for the
Leidig / Carmel Convalescent Hospital Annexation Project**

Dear Mr. Roseth:

The Transportation Agency for Monterey County is the Regional Transportation Planning Agency and Congestion Management Agency for Monterey County. Transportation Agency staff has reviewed the Mitigated Negative Declaration for the Leidig / Carmel Convalescent Hospital Annexation Project.

The project involves the annexation of approximately 3.62 acres of located near the northeast boundary of Carmel-by-the-Sea on the north side of Valley Way and the adoption of a zoning designation for the property, with no development or change to the existing site conditions proposed at this time. Transportation Agency staff offers the following comments for your consideration:

Regional Road & Highway Impacts

1. The Transportation Agency is supportive, in part, of the City's planned mitigation measures (MM 15-1 through 15-5), which require that future developments in the annexation area analyze project-specific traffic impacts, complete street and sidewalk improvements, contribute a fair-share payment in traffic impact fees, and provide safety improvements to Highway 1 / Valley Way for developments of at least ten dwelling units. While the document states that the mitigation measures ensure that new developments' will comply with the appropriate local and regional fee program, the measures as listed do not specifically address cumulative impacts.

The Transportation Agency and Caltrans consider payment of regional development impact fees, as identified in our agency's *Nexus Study for a Regional Development Impact Fee*, on an ad hoc basis as adequate mitigation for new developments' cumulative impacts to state highways and regional roads. The Transportation Agency is expecting that future projects in the annexation area will contribute their fair share

in regional fees and request that this condition be included as a mitigation measure in the final document. If building permits are to be issued prior to the adoption of the fee program, regional fees should be paid on an ad hoc basis. These mitigations are being requested of all regionally-significant projects in the county.

The Transportation Agency requests the following changes to the mitigation measures:

MM 15-1: Following annexation, future development projects shall be required to provide project specific and cumulative condition traffic analyses at the time of application.

MM 15-3: Following annexation, each future development project shall be required to contribute its fair share of the local and regional fees for traffic impact mitigation, as identified by the City and the Transportation Agency for Monterey County's Nexus Study for a Regional Development Impact Fee, which may include the State Route 1 reimbursement program, prior to the issuance of building or grading permits for the development of the property.

2. If construction of new developments located in the planned annexation area are set to begin before the annexation is approved, the Transportation Agency recommends that the infrastructure, particularly roadways, curb, sidewalks, gutters, and lighting, be constructed to a standard no less than what the City currently requires to ensure that the City or new residents will not have to bear the cost of upgrades once the annexation is complete.

Pedestrian, Bicycle, & Transit Travel

3. The Transportation Agency supports accommodation of alternative forms of transportation both through the design of transportation facilities and through the design and orientation of land uses. New developments in the project area should give consideration to existing and planned bicycle and pedestrian facilities, such as the Carmel Hill Trail, and incorporate appropriate access to and from the project site and direct linkages to other facilities into site designs. Monterey-Salinas Transit's *Designing for Transit* Guideline Manual should also be used as a resource for accommodating transit access to the project site. The Transportation Agency requests that the document be updated to include and clarify how the City will ensure that alternative forms of transportation will be accommodated in future developments.

Thank you for the opportunity to review this document. If you would like to discuss these comments further, please contact Michael Zeller of my staff at (831) 775-0903.

Sincerely,



Debra L. Hale
Executive Director

CC: Dave Murray, California Department of Transportation (Caltrans) District 5
Ron Lundquist, Monterey County Department of Public Works
Carl Sedoryk, Monterey-Salinas Transit
Nicholas Papadakis, AMBAG
Douglas Quentin, Monterey Bay Unified Air Pollution Control Distric