



December 3, 2008

Mr. Sean Conroy, Building and Planning Services Manager
City of Carmel-by-the-Sea
Community Planning and Building
P.O. Drawer G, Carmel-by-the-Sea
Monte Verde Street between Ocean and 7th Avenues
Carmel-by-the-Sea, California 93921

SUBJECT: Comments on the Notice of Intent to Adopt a Mitigated Negative Declaration for the Carmel Sands Hotel Redevelopment Project

Dear Mr. Conroy:

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 Notice of Intent to Adopt a Mitigated Negative Declaration for the Carmel Sands Hotel Redevelopment Project.

The proposed project consists of the demolition of an existing 20,780 square-foot, 42-room motel and the construction of a new 42,017 square-foot, 58-room hotel with a bar and day spa located at the northeast corner of 5th Avenue and San Carlos Street in the City of Carmel. Transportation Agency staff offers the following comments for your consideration:

Regional Roads & Highways

1. The traffic analysis for the document indicates that the proposed development will result in a net increase of 106 weekday average daily trips, which in some instances will travel on segments of roadways experiencing degraded levels of service under existing conditions. Existing traffic volumes on Junipero Avenue and at the San Antonio Pebble Beach Gate utilize traffic counts from 2003, so the identified net increase in trips may be undercounted without more recent traffic count data. No mitigations are offered for these impacts based on the assumption that the increase in trips “does not exceed the ‘de minimus’ impact standard for impact assessment as established by Caltrans.”

However, the significance threshold established by Caltrans is that a development that generates even a single new vehicle trip on a State facility with degraded levels of service creates an impact that must be mitigated. Since the County defers to Caltrans

standards for impact assessment when County roads intersect State highways, this threshold would also apply to several County roads in the development as well. The Transportation Agency expects that all project-specific and cumulative transportation impacts generated by this development will be mitigated:

- a) The Transportation Agency supports mitigation of project-specific impacts through fair-share contribution towards improvement projects designed to improve levels of service of roadway segments in the affected area. The traffic analysis prepared for the document indicates that the development will add vehicle trips to several roadways, including Highway 1, Junipero Avenue, Ocean Avenue, Carmel Valley Road, and Rio Road, potentially requiring mitigation. The document should be updated to address this issue and provide appropriate mitigation measures for all project-specific impacts.
- b) Cumulative transportation impacts should be addressed through a contribution to the Regional Development Impact Fee program, which was adopted by the City of Carmel. Considering that the proposed project is a redevelopment of an existing use, a credit towards the regional fees could be granted to this project for the current trips generated by the motel. This credit would be in effect provided that the construction of the proposed hotel begins within one year of demolition. This document should be revised to include a payment of regional fees by the proposed development as the preferred method for mitigating cumulative transportation impacts.

Pedestrian & Bicycle Facilities

2. The Transportation Agency supports accommodation of alternative forms of transportation (rail, bus transit, bicycle and pedestrian transportation), both through the design of transportation facilities, and through the design and orientation of land uses. The Transportation Agency supports that the project will be “required to comply with City regulations concerning inclusion of alternative transportation support facilities and equipment, such as bike racks.” To accommodate this policy, our agency offers the following for consideration:
 - a) It can be expected that visitors to the hotel will utilize bicycle and pedestrian facilities to access shopping and restaurants in downtown Carmel, along 17-Mile Drive, and Pebble Beach. To accommodate the demand for bicycle and pedestrian facilities, site planning should place a premium on safe and accessible pedestrian access to the site from intersections and crosswalks, sidewalks, and bicycle facilities. The project site should also be designed with sidewalks that connect to external facilities, and provides access to transit stops. As per Caltrans standards, bicycle lanes included in the development, constructed off-site as mitigation, or that lead into the project site at main entrance points should be constructed to the left of any right-hand turn lanes.

- b) The Transportation Agency supports that bicycle racks and lockers will be installed and made publicly available in the development and recommends that they be placed near building entrances. The development should also consider providing adequate lighting to improve safety and visibility.

Transit Travel

3. The project site is currently serviced by Monterey-Salinas Transit fixed route service with Lines 4, 5, 7, 11, 22, and 24. Our agency recommends that the development work closely with Monterey-Salinas Transit to ensure that there will be adequate access to any planned transit facilities as well as to the facilities that currently exist. In addition, Monterey-Salinas Transit's *Designing for Transit* Guideline Manual should be used as a resource for accommodating any future transit access to the project site.

Thank you for the opportunity to review this document. If you have any questions, 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
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