

November 30, 2009

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 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 46,978 square-foot, 42-room hotel with a bar day spa, meeting rooms, and retail space 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 Transportation section of the document indicates that the proposed development is not anticipated to significantly change vehicle trips, while more than doubling of the site's footprint. The document concludes that the changes to traffic generation are anticipated to be less than significant, with no mitigations offered. The reasons given to reconcile the site's expansion with this conclusion are that the new hotel will have the same number of rooms as the existing motel and that the current restaurant is full-service whereas the proposed establishment will be a limited service bar.

This analysis is at odds with the 2008 Mitigated Negative Declaration that was originally circulated for the development. The 2008 document stated that the development would add vehicle trips to several roadways (including Highway 1, Junipero Avenue, Ocean Avenue, Carmel Valley Road, and Rio Road) with an overall net increase of 106 daily trips. The analysis for the 2008 document stands in even more contrast with the current proposal considering that retail space was not in the original development proposal and not studied as part of the 2008 traffic analysis.

Absent a traffic study showing that the proposed development will indeed generate a similar amount of trips as the current use, the anecdotal reasons given to account for traffic impacts being designated as “less than significant” fail to take into account that the proposed uses of the new development actually have higher associated trip rates. Considering just the change of use from motel to hotel, a 42-room hotel is estimated to generate 107 more daily trips than a 42-room motel. Adding in the trips generated by the proposed day spa, specialty retail, and bar (which has a higher trip rate than sit-down restaurants), the net increase in daily trips is likely only to increase. These impacts are not properly addressed in the current Mitigated Negative Declaration.

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 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 available provided that the construction of the proposed hotel begins within one year of demolition. The document should be revised to include a payment of regional fees by the proposed development as mitigation for 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 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 bike lockers and 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
Yaz Emrani, Monterey County Department of Public Works
Carl Sedoryk, Monterey-Salinas Transit
John Doughty, AMBAG
Ed Kendig, Monterey Bay Unified Air Pollution Control District