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## **Summary of CVA's Response to the Draft Subsequent EIR (DSEIR) on the Carmel Valley Traffic Improvement Program (TIP)**

The DSEIR provides five scenarios for future traffic conditions in Carmel Valley to the year 2030, based on a "Traffic Improvement Program" (TIP) of needed, but relatively minor improvements on Carmel Valley Road. In four of the five scenarios examined, the current subdivision moratorium is removed. *The DSEIR concedes that further growth could result in traffic deterioration and violate established road standards, but deems this acceptable.* CVA's examination of the DSEIR finds it to be deeply flawed and inconsistent with the goals and policies of the Carmel Valley Master Plan (CVMP). Among the points that CVA raises are the following:

- The DSEIR's own growth assumptions show that the 'Traffic Improvement Program' would *not improve future traffic levels of service (LOS)* on Carmel Valley Road; crucial segments of CV Road would continue to become more congested even with improvements constructed. According to DSEIR data, overall traffic on CVR could worsen by more than 100% (as calculated in PTSF values). ***The average worsening for all scenarios and all road segments by 2030 is 43%.***
- The Traffic Improvement Program itself is *growth-inducing* (DSEIR denies notwithstanding), as the improvements only get paid for by new development projects. It becomes a vicious circle: traffic improvements get constructed only if new subdivisions are approved, which then create even more need for more traffic improvements. Among other policies, this violates the first planning objective of the CVMP: "to preserve the rural character of Carmel Valley."
- The DSEIR *misuses 1986 LOS data* to justify low historic LOS of D & E, and misinterprets CVMP 39.3.2.1 to suggest those low levels of service are acceptable policy. Both the CVMP and the national regulatory framework that governs road LOS show clearly that the ***minimum*** LOS for Carmel Valley Road is C.
- In the Carmel Valley subdivision moratorium (Resolution 02-024), removal is conditioned on an updated Plan containing effective "approaches to link growth with infrastructure." The DSEIR does not require achievement of this goal, nor is there any reasonable forecast that it will be achieved in the foreseeable future. Thus, ***there is no justification for lifting the subdivision moratorium in Carmel Valley.*** The objective of the moratorium (and purportedly of the TIP) is to prevent further degradation of traffic conditions in Carmel Valley, but this will not happen, even according to the flawed DSEIR. Why, then, is the lifting of the moratorium a major element of the DSEIR?

CVA fears that the DSEIR appears to be an attempt to provide a rationale for removing restraints on new subdivisions, rather than an independent, objective and reliable evaluation of the TIP.

### **CVA recommends:**

1. That certification of the DSEIR be denied by the Board of Supervisors, and
2. That the subdivision moratorium be retained and made permanent, which is the only course of action consistent with the planning goals of the CVMP.