
APPENDIX A

NOTICE OF PREPARATION, INITIAL STUDY, AND RESPONSES TO
NOTICE OF PREPARATION

BOARD OF EDUCATION

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Notice of Preparation

To: Interested Parties

Date: May 12, 2021

Subject: Notice of Preparation of Draft Environmental Impact Report
Carmel High School Stadium Lights

Lead Agency: Carmel Unified School District

NOTICE IS HEREBY GIVEN THAT the Carmel Unified School District will be the Lead Agency under the California Environmental Quality Act (CEQA) and will prepare an Environmental Impact Report (EIR) for the proposed project. This NOP includes a project description and an overview of the potential impacts that will be addressed in the EIR. An initial study has been prepared for the proposed project by the Carmel Unified School District.

Project Title: Carmel High School Stadium Lights

Project Applicant: Carmel Unified School District

Project Location: The subject property is located at 3600 Ocean Avenue on the campus of Carmel High School in unincorporated Monterey County, immediately east of State Route 1.

The project description, location map, and the potential environmental effects are contained in the attached **Initial Study**.

The purpose of this notice is: (1) to serve as the Notice of Preparation to potential Responsible Agencies, agencies involved in funding or approving the project, and Trustee Agencies responsible for natural resources affected by the project, pursuant to Section 15082 of the CEQA Guidelines; and (2) to advise and solicit comments and suggestions regarding the preparation of the EIR, environmental issues to be addressed in the EIR, and any related issues, from interested parties in addition to those noted above, including interested or affected members of the public. The Carmel Unified School District requests that any potential Responsible or Trustee Agency responding to this notice do so in a manner consistent with CEQA Guidelines Section 15082(b).

All parties that have submitted their names and mailing addresses will be notified as part of the project's CEQA review process. If you wish to be placed on the mailing list or have any questions or need additional information, please contact the person identified below. A copy of the NOP and initial study is on the Carmel Unified School District's website (<https://www.carmelunified.org/>) under the CUSD Announcements sections and is on file at the Carmel Unified School District offices, located at the address provided below, and is also available at the Carmel High School front office, 3600 Ocean Avenue, Carmel, CA 93923.

Scoping Meeting (during regularly scheduled Board of Education Meeting):

Date: Wednesday, May 26, 2021

Time: 5:30 PM

Location: Via telephonic/electronic meeting. Link will be posted on District website
(<https://www.carmelunified.org/>) no later than time and date of the meeting.

30-Day NOP Review Period: In accordance with CEQA, should your agency have any comments, it is requested to provide a written response to this NOP within the 30-day NOP review period between May 13, 2021 and June 14, 2021. Written comments must be received at the address below no later than 5:00 p.m. on June 14, 2021.

Please indicate a contact person in your response and send it to the following contact:

Dan Paul, Director of Facilities & Transportation

Telephone: (831) 624-6311, ext. 2060

Carmel Unified School District

Email: dpaul@carmelunified.org

4380 Carmel Valley Road

Carmel, CA 93923

May 12, 2021

Date



Yvonne Perez, Chief Business Official
Carmel Unified School District

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A. BACKGROUND

Project Title	Carmel High School Stadium Lights
Lead Agency Contact Person and Phone Number	Carmel Unified School District Dan Paul, Director of Facilities & Transportation 831-624-6311, ext. 2060
Date Prepared	May 2021
Study Prepared by	EMC Planning Group Inc. 301 Lighthouse Avenue, Suite C Monterey, CA 93940
Project Location	Carmel High School 3600 Ocean Avenue State Route 1 – Unincorporated Monterey County APN: 015-081-001
Project Sponsor Name and Address	Carmel Unified School District 4380 Carmel Valley Road Carmel, CA 93923
General Plan Designation	Public/Quasi-Public (Urban Reserve) (Monterey County 2010 General Plan – Greater Monterey Peninsula Land Use Plan)
Zoning	Public/Quasi-Public with Design Control District Overlay (PQP-D) (Monterey County Zoning)

Setting

The approximately 3.8-acre project site is the existing athletic stadium located on the south edge of the Carmel High School (high school) campus. The campus is located immediately east of State Route 1 and approximately 0.50 miles east of the City of Carmel-by-the-Sea in unincorporated Monterey County. Surrounding the project site includes the high school campus and lighted swimming pool complex to the north; a residential neighborhood along Flanders Drive and Hatton Canyon to the east; the existing high school tennis courts and baseball diamond, along with a residential neighborhood along Morse Drive to the south; and State Route 1 and residential neighborhoods beyond to the west. The high school

campus is accessed at three entrances including at Ocean Avenue immediately northwest of the stadium site, a northbound only entrance along State Route 1, and at Morse Drive (for access to the tennis court and baseball diamond). Original construction of the stadium occurred in the 1940s, shortly after the high school's opening in 1940, with significant renovations having been completed in the mid-2010s, including installation of a synthetic turf field, new home bleachers, electronic scoreboard, and press box. [Figure 1, Regional Location](#), presents the regional location of the project site. [Figure 2, Aerial Photograph](#), presents the project site and surrounding land uses.

Description of Project

The Carmel Unified School District (school district) is proposing to install new lighting at the existing stadium at Carmel High School. No additional improvements are proposed. The addition of the stadium lights is intended to allow for Friday night football games and other nighttime games and practices in anticipation of the state's "late start law," which will go into effect starting in the fall of 2022 and will affect the ability of various sports teams from practicing later in the day without lights. The school district plans to install the stadium lighting by the start of the 2022-2023 school year. [Figure 3, Preliminary Illumination Exhibit](#), presents an overview of the stadium with proposed lighting locations (identified as Locations F1 through F4) and footcandle measurements across the expanse of the football field. Two of the lighting poles will be located behind the northern, home seating area and will extend 70 feet high accounting for a 10-foot higher grade than the south, visitor seating bleachers, which will be 80 feet in height. Each lighting fixture will generate a total of 44 luminaires with an average kilowatt of 68.82 (74.8 maximum).

Other Public Agencies Whose Approval is Required

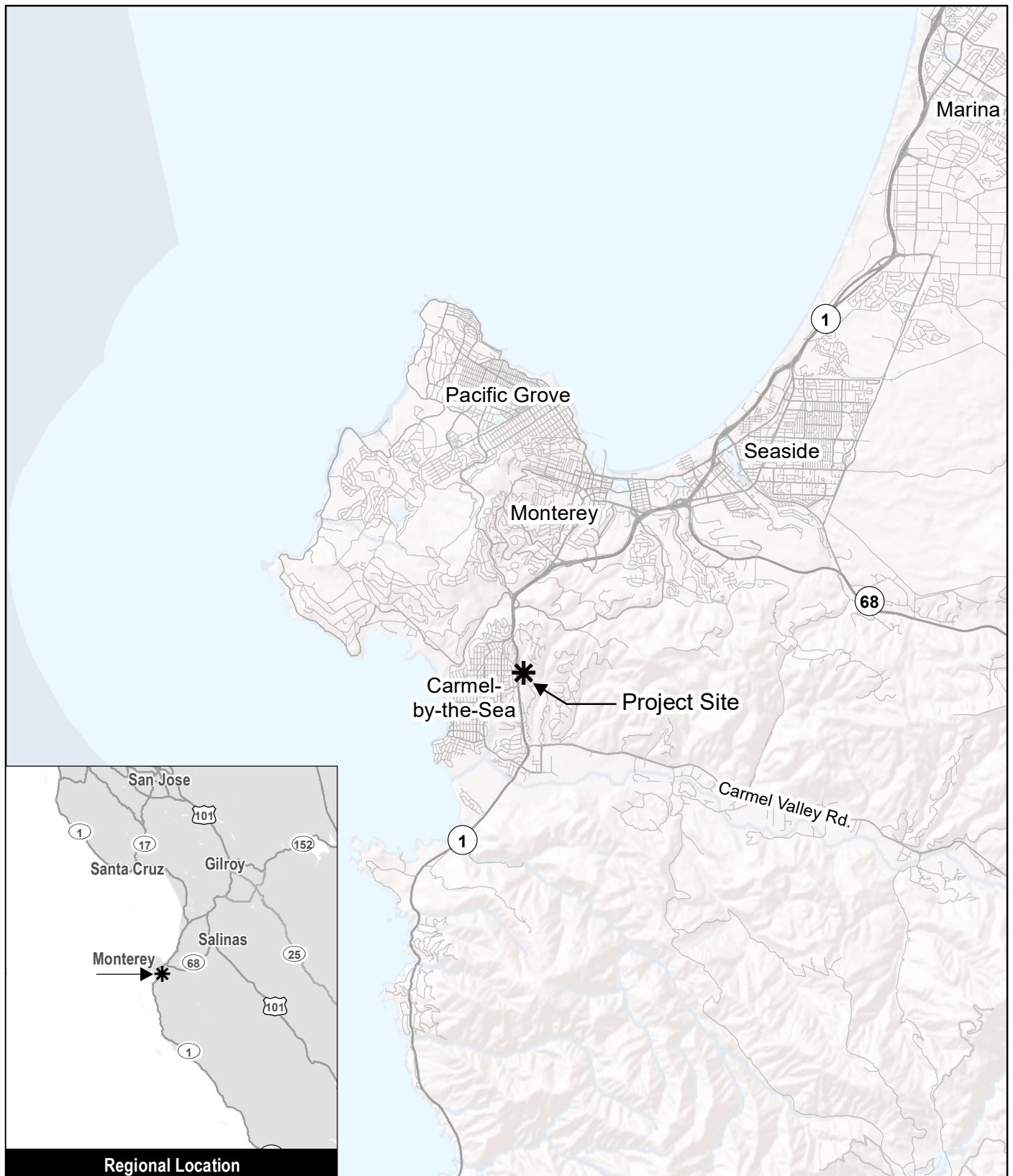
- Division of the State Architect (Written Approval of Plans)

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

On March 29, 2021, the school district sent an offer of consultation letter to the tribal representative of the Ohlone/Costanoan-Esselen Nation (OCEN). If the tribal representative responds and requests consultation, the consultation process will be reported in the Draft EIR.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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Source: ESRI 2019

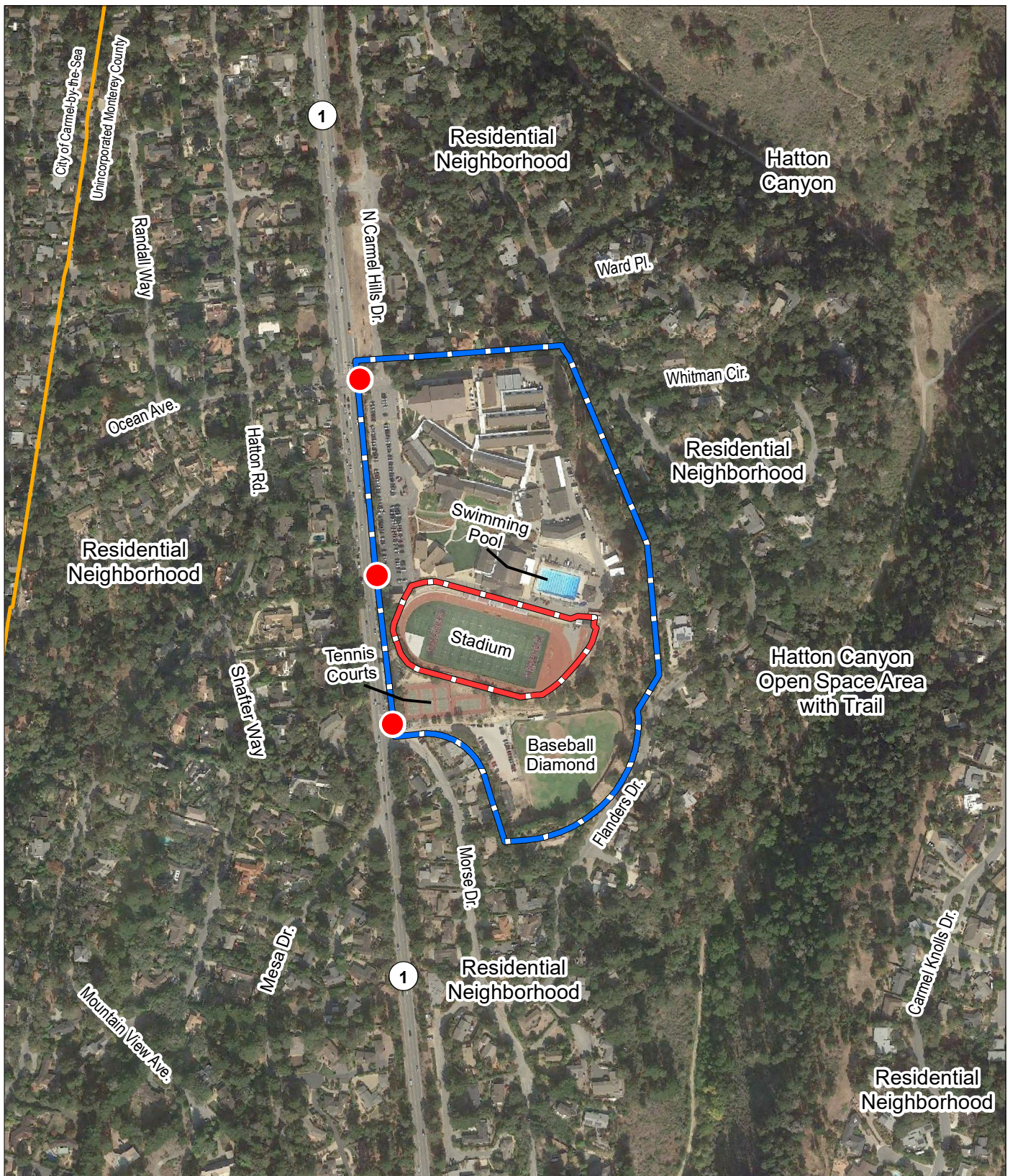
Figure 1

Regional Location



Carmel High School Stadium Lights Initial Study

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0 450 feet

- Project Site Boundary
- Carmel-by-the-Sea City Limits
- Carmel High School Campus Boundary
- Campus Entrances

Source: Google Earth 2018
Monterey County GIS 2019

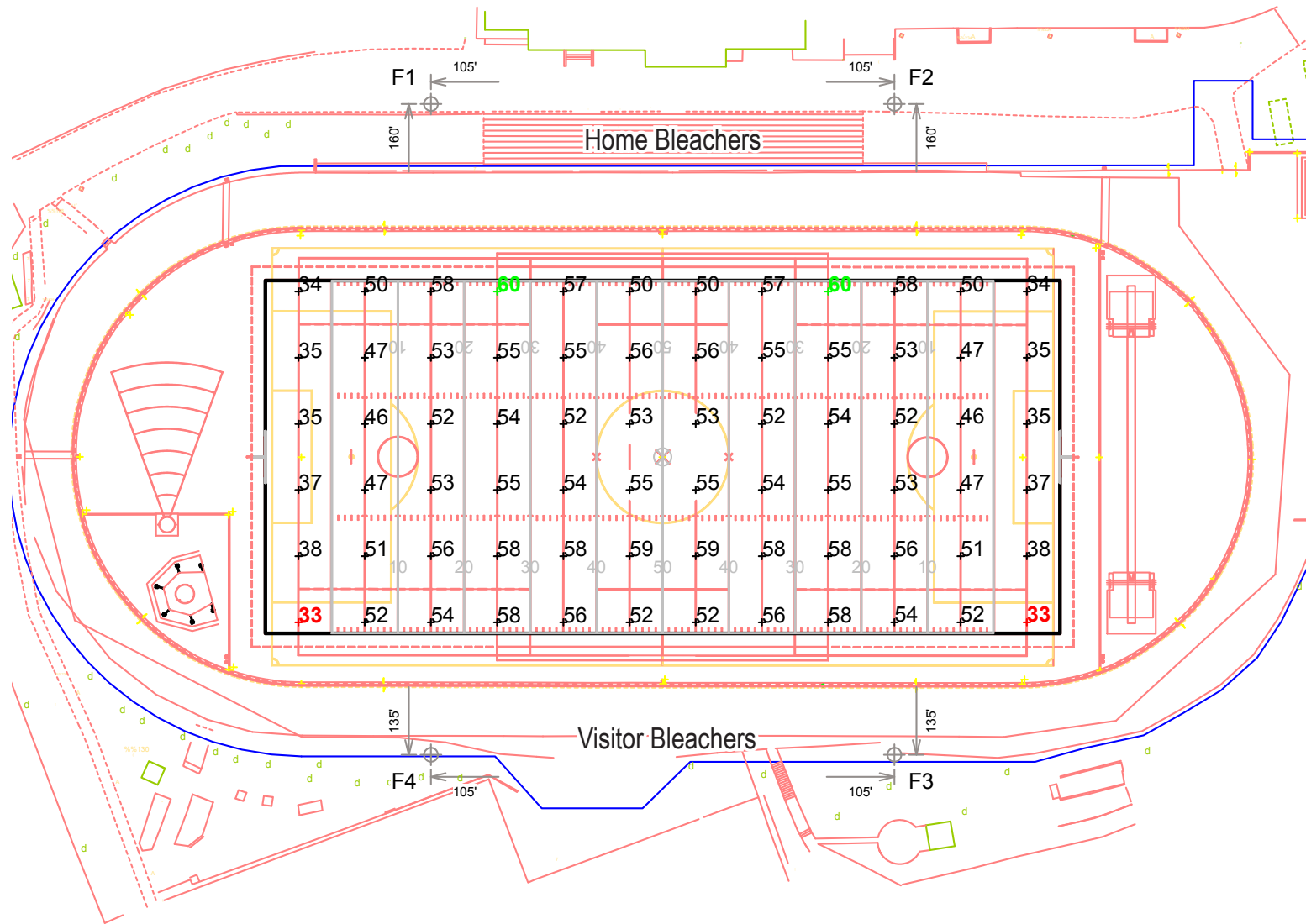
Figure 2

Aerial Photograph

Carmel High School Stadium Lights Initial Study



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Source: Musco Sports Lighting 2021



Figure 3
Preliminary Illumination Exhibit
Carmel High School Stadium Lights Initial Study

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B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|---|--|--|
| ☒ Aesthetics | ☒ Greenhouse Gas Emissions | ☐ Population/Housing |
| ☐ Agriculture and Forestry Resources | ☐ Hazards & Hazardous Materials | ☐ Public Services |
| ☒ Air Quality | ☐ Hydrology/Water Quality | ☐ Recreation |
| ☒ Biological Resources | ☐ Land Use/Planning | ☒ Transportation |
| ☐ Cultural Resources | ☐ Wildfire | ☒ Tribal Cultural Resources |
| ☒ Energy | ☐ Mineral Resources | ☐ Utilities/Service Systems |
| ☐ Geology/Soils | ☒ Noise | ☒ Mandatory Findings of Significance |

C. DETERMINATION

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Yvonne Perez, Chief Business Official

Date

D. EVALUATION OF ENVIRONMENTAL IMPACTS

Notes

1. A brief explanation is provided for all answers except “No Impact” answers that are adequately supported by the information sources cited in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer is explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once it has been determined that a particular physical impact may occur, then the checklist answers indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less-Than-Significant Impact with Mitigation Measures Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less-Than-Significant Impact.” The mitigation measures are described, along with a brief explanation of how they reduce the effect to a less-than-significant level (mitigation measures from section XVII, “Earlier Analyses,” may be cross-referenced).
5. Earlier analyses are used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier document or negative declaration. [Section 15063(c)(3)(D)] In this case, a brief discussion would identify the following:
 - a. “Earlier Analysis Used” identifies and states where such document is available for review.
 - b. “Impact Adequately Addressed” identifies which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and states whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. “Mitigation Measures” — For effects that are “Less-Than-Significant Impact with Mitigation Measures Incorporated,” mitigation measures are described which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances, etc.) are incorporated. Each reference to a previously prepared or outside document, where appropriate, includes a reference to the page or pages where the statement is substantiated.
7. "Supporting Information Sources" — A source list is attached, and other sources used or individuals contacted are cited in the discussion.
8. This is a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected. This is the format recommended in the CEQA Guidelines as amended 2018.
9. The explanation of each issue identifies:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any to reduce the impact to less than significant.

1. AESTHETICS

Except as provided in Public Resources Code Section 21099 (Modernization of Transportation Analysis for Transit-Oriented Infill Projects), would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista? (1, 2, 3, 5, 6, 7, 21, 26)	☒	☐	☐	☐
b. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? (1, 2, 3, 5, 6, 7, 21, 26)	☒	☐	☐	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (1, 2, 3, 4, 5, 6, 7, 21, 26)	☒	☐	☐	☐
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? (7, 21, 26)	☒	☐	☐	☐

Comments:

- a/c. Installation of stadium lighting and potential impacts to existing public viewsheds and scenic vistas in the area will be evaluated in the EIR.
- b. The project site is located immediately adjacent to and west (less than 100 feet away at the far west edge of the stadium track) of State Route 1, which Caltrans has officially designated as a scenic highway. In addition, Monterey County has designated the State Route 1 corridor starting at Carmel River north through the City of Monterey as a "Scenic Highway Corridor" with the high school campus located in a "Sensitive" visual designation (Monterey County 2010b). There is a five-foot grape stake fence and a row of cypress and pine trees between the highway and the stadium facilities, but the majority of the stadium site is largely visible from the highway. The project's impacts on scenic resources viewed from State Route 1 will be evaluated in the EIR.

- d. The proposed project is the installation of four (4) new stadium field lights measuring between 70 feet (north) and 80 feet (south) in height. Given the height and proximity of the stadium to existing residential neighborhoods and an officially designated state scenic highway, the proposed project has the potential to create a new source of substantial light or glare, which would adversely affect nighttime views in the area. On and off-site lighting impacts will be addressed in the EIR.

2. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts on agricultural resources are significant environmental effects and in assessing impacts on agriculture and farmland, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use? (2, 8, 26)	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? (2, 9, 26)	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? (4, 5)	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use? (2, 4, 5, 26)	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use? (2, 5, 8, 26)	☐	☐	☐	☒

Comments:

- a. The project site is currently developed with an athletic stadium as part of a high school campus. The project site and land surrounding the project site are identified as “Urban and Built-up Land” on the California Department of Conservation’s Important Farmland Finder. Therefore, the proposed project would have no impact on prime farmland, unique farmland, or farmland of statewide importance.
- b. There are no land uses with or adjacent to the proposed project that are zoned for agricultural uses. There are no properties within or adjacent to the project site that currently have a Williamson Act contract. Therefore, the proposed project would not conflict with the provisions of the Williamson Act or agricultural zoning.
- c-e. The project site is zoned “Public/Quasi-Public” by Monterey County. The project site and adjacent land uses are not zoned for forestland or timberland uses. The proposed project would not convert forest land to non-forest land. The surrounding properties are currently developed with residential uses. Therefore, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, or result in the loss of forest land or conversion of forest land to non-forest use.

Agricultural and forestry resources will not be addressed further in the EIR.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan? (1, 7, 27)	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard? (1, 7)	☒	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations? (1, 7, 27)	☐	☐	☐	☒
d. Result in other emissions, such as those leading to odors adversely affecting a substantial number of people? (1, 7)	☐	☐	☐	☒

Comments:

- a. The project site is located in the North Central Coast Air Basin, which is under the jurisdiction of the Monterey Bay Air Resources District (air district). Population-generating projects are evaluated for their consistency with applicable air quality management plans. The proposed project would not conflict with or obstruct implementation of the air district's air quality management plans, as the proposed project is not population generating (MBUAPCD Air Quality Guidelines, page 5-10).
- b. The proposed project could result in an increase in criteria air emissions during construction and operations, primarily through incremental increase in new vehicle trips. The proposed project's impact (criteria air emissions) on air quality will be evaluated in the EIR.
- c. The proposed project is a very small construction project and therefore, would not expose sensitive receptors (e.g., adjacent residents) to substantial pollutant concentrations (MBUAPCD Air Quality Guidelines, page 4-2).

- d. The proposed project is a very small construction project and therefore, would not result in emissions, such as those leading to odors, that would adversely affect a substantial number of people. Additionally, operation of the lights does not result in odors (MBUAPCD Air Quality Guidelines, page 3-5).

Consistency with the clean air plan, impacts to sensitive receptors, and odor impacts will not be evaluated further in the EIR.

The proposed project's net increase of criteria pollutant for which the project region is nonattainment will be evaluated in the EIR.

4. BIOLOGICAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? (1, 7, 19, 21, 26)	☒	☐	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? (1, 3, 7, 19, 21, 26)	☒	☐	☐	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means? (1, 7, 19, 21, 26)	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (1, 2, 3, 7, 19, 21, 26)	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (1, 2, 3, 7, 19, 26)	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (1, 2, 3, 7, 19)	☐	☐	☐	☒

Comments:

Patrick Furtado, a qualified biologist with EMC Planning Group, conducted a biological survey on April 12, 2021 to document existing biological resource conditions on and surrounding the project site.

- a. The proposed stadium improvements will be located within an already developed portion of the Carmel High School campus. According to the California Natural Diversity Database (CDFW 2021), there are eight special-status species records known to occur within the vicinity of the project, particularly within Hatton Canyon about 800 feet to the east. The EIR will address potential effects of the proposed project lighting on species identified as a candidate, sensitive, or special status species.
- b. Riparian habitat was identified east of the stadium site during the biological survey. Potential effects of lighting on riparian habitat and associated wildlife species as a result of the proposed project will be addressed in the EIR.
- c. The project site would not remove, fill, or interrupt any protected wetlands. This issue will not be addressed further in the EIR.
- d. The proposed project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors. This issue will not be addressed further in the EIR.
- e. The school district is not subject to local policies or ordinances; however, potential impacts to trees will be addressed under item a. above.
- f. The project area is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

As identified above, impacts to biological resources as a result of the proposed project will be assessed in the EIR.

5. CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to section 15064.5? (1, 3, 5, 7, 22, 25)	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5? (1, 3, 5, 7, 22, 25)	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries? (1, 3, 5, 7, 22, 25)	☐	☒	☐	☐

Comments:

- a, b. The Monterey County Archaeological Sensitivity Zones map shows the project site within a "Moderate Sensitivity Zone." Therefore, if undiscovered historical resources or unique archaeological resources are located within the project site, they could be adversely affected by project development.

An archaeological investigation was conducted and cultural resources evaluation prepared by Archaeological Resource Management (ARM) for the proposed project. A records search was conducted which revealed no previously recorded sites are located within the proposed project area. In addition, no previously recorded historic or archaeological resources are located within a one-quarter mile radius of the proposed project area. A survey was conducted by a qualified ARM archaeologist on all visible open land surfaces in the project area. No traces of significant cultural material, prehistoric or historic, were noted during the survey.

However, there is always the potential to accidentally discover unknown buried historic resources or unique archaeological resources during earth moving activities. Implementation of the following mitigation measure would reduce this potential, significant impact to a less-than-significant level.

Mitigation Measure

- CR-1 In the event that archaeological resources (artifacts, concentrations of shell/bone/rock/ash) are encountered, all construction within a fifty-meter radius of the find should be stopped, Carmel Unified School

District staff notified, the Monterey County Resource Management Agency contacted, and an archaeologist retained to examine the find and make appropriate recommendations. Should the archaeologist determine the find to be a significant historic resource or a unique archaeological resource, measures pursuant to CEQA Guidelines section 15064.5 shall be implemented.

- c. Although there is no evidence of human remains associated with the project site, there is the possibility of an accidental discovery of human remains during construction activities. Disturbance of Native American human remains is considered a significant adverse environmental impact. Implementation of the following mitigation measure would reduce this potential, significant impact to a less-than-significant level.

Mitigation Measure

CR-2 Due to the possibility that human remains may be discovered during construction activities; the following language shall be included in all project construction documents:

“If human remains are found during construction, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner is contacted to determine that no investigation of the cause of death is required.

If the coroner determines the remains to be Native American, then the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent (MLD) from the deceased Native American. The MLD may then make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and associated grave goods as provided in Public Resources Code Section 5097.98.

The landowner or authorized representative will rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance if: a) the Native American Heritage Commission is unable to identify a MLD or the MLD failed to

make a recommendation within 48 hours after being allowed access to the site; b) the descendent identified fails to make a recommendation; or c) the landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.”

Cultural resources will not be addressed further in the EIR.

6. ENERGY

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (1, 7)	☒	☐	☐	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (1, 7)	☒	☐	☐	☐

Comments:

- a, b. The proposed project will result in increased demand for energy during its construction and long-term operation. The project's energy impacts will be evaluated in the EIR.

7. GEOLOGY AND SOILS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42? (2, 3, 5, 7, 10, 11, 12, 13, 23, 24)	☐	☐	☐	☒
(2) Strong seismic ground shaking? (2, 3, 5, 7, 10, 11, 12, 13, 23, 24)	☐	☐	☐	☒
(3) Seismic-related ground failure, including liquefaction? (2, 3, 5, 7, 10, 11, 12, 13, 23, 24)	☐	☐	☐	☒
(4) Landslides? (2, 3, 5, 7, 10, 11, 12, 13, 23, 24)	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil? (7, 12, 13, 23, 24)	☐	☐	☐	☒
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? (7, 12, 13, 23, 24)	☐	☐	☐	☒
d. Be located on expansive soil, creating substantial direct or indirect risks to life or property? (7, 12, 13, 23, 24)	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (7, 12, 13, 20, 23, 24)	☐	☐	☐	☒

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (2, 3, 5)	☐	☐	☐	☒
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Comments:

- a. (1, 2) According to the “Geologic Hazards Map for Monterey County,” the project site is immediately south of the nearest known fault line, Hatton Canyon, which runs approximately 900 feet to the north of the project site from the Del Monte Forest area along the ridgeline above the high school campus and then south to Carmel Valley (Monterey County 2021c; Cleary Consultants 2014). Like the rest of Monterey County, the project site is within Seismic Zone 4, which is considered the most seismically active zone in the United States (Monterey County 2008, p. 4.4-9). According to the California Geological Survey, the project site may be subject to moderate ground shaking due to its proximity to active faults in the area (CGS 2016). However, the project would not involve activities that would exacerbate seismicity risks and therefore, not result directly or indirectly in potentially substantial adverse effects, including the risk of loss, injury, or death involving fault rupture or seismic ground shaking.
- (3) A 2014 geotechnical report prepared for previous stadium improvements indicates that the risk of earthquake-induced soil liquefaction is remote at the project site. Therefore, the proposed project would not result in seismic-related ground failure, including liquefaction.
- (4) The project site is located in an area of low landslide susceptibility (Monterey County 2021c). While the larger high school campus is located on a southern sloping hill, the stadium site itself is flat and not an area at risk for landslides. Therefore, the project site would not alter or exacerbate landslide risks.
- b. Project construction would require minimal earthwork activities associated with installation of the new stadium light poles, but would not result in soil erosion or the loss of topsoil.
- c, d. A 2014 geotechnical report for previous stadium improvements indicated that there was a low potential for liquefaction, densification, and lateral spreading of the soils underlying the project site (Cleary Consultants 2014). Project construction would require minimal earthwork activities associated with installation of the new stadium light poles. Therefore, the proposed project would not result in impacts due to location on a geologic unit or soil that is unstable, or that would become unstable as a

result of the project, or result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse and creating substantial direct or indirect risks to life or property due to be locating on expansive soil.

- e. Installation of new stadium lighting would not involve the use of septic systems, as sewer service is provided to the high school by Carmel Area Wastewater District (CAWD 2021).
- f. There are no unique geologic features located on or adjacent to the project site. There are no specific indications of paleontological resources associated with the project site (Monterey County 2008). The proposed project would involve minimal if any earthmoving activities that would have the potential to impact paleontological resources. Therefore, the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Geology and soils will not be addressed further in the EIR.

8. GREENHOUSE GAS EMISSIONS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (1, 7)	☒	☐	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (1, 7)	☒	☐	☐	☐

Comments:

- a, b. The proposed project will generate greenhouse gas emissions (GHG) during its construction and long-term operation. Construction GHG impacts will be addressed in the EIR in terms of the appropriate GHG threshold for the project.

The net change in operational GHG emissions will also be evaluated based on the change from existing stadium use to post-project use. The project has potential to increase operational GHG emissions from transportation sources if it results in an increase in vehicle trips to and from the campus and an increase in vehicle miles traveled. While electricity consumption may increase, related GHG emissions changes would be evaluated in light of the fact that electricity is supplied to the campus by Central Coast Community Energy from 100 percent renewable sources. If the project results in increased operational GHG emissions, the increase will be compared to a threshold of significance. To date, the air district has not adopted or recommended a GHG threshold of significance that is applicable to land use projects, nor has it prepared a qualified GHG reduction plan for use/reference by local agencies. Therefore, a threshold of significance will be developed as part of the EIR analysis based on precedent set by the adjoint air district, the Bay Area Air Quality Management District, and will be used to establish any potential for significant GHG impacts.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (1, 7)	☐	☐	☐	☒
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (1, 7)	☐	☐	☐	☒
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (1, 7)	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, create a significant hazard to the public or the environment? (1, 7, 14, 15)	☐	☐	☐	☒
e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or a public-use airport, result in a safety hazard or excessive noise for people residing or working in the project area? (1, 7, 16)	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (1, 7)	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (1, 7, 17, 18)	☐	☐	☐	☒

Comments:

- a. The installation of new lighting at the existing stadium at Carmel High School would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

- b. The project site consists of an existing athletic stadium which has been in use since at least the 1940s and experienced extensive renovations in the mid-2010s. Therefore, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- c. The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste.
- d. Government Code Section 65962.5 requires that the Department of Toxic Substances Control compile and regularly update a list of hazardous waste facilities and sites. A search of the Envirostar website (California Department of Toxic Substances Control 2021) and the Geotracker website (California Water Resources Control Board 2021) revealed that the project site is not on the list.
- e. The nearest airport to the project site is the Monterey Regional Airport and the project site is not located within its land use plan nor is the project site located within its 2013 or 2033 Noise Contour exhibits (Monterey County Airport Land Use Commission 2019). Therefore, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area.
- f. The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- g. The project site is located within a rural/suburban area under the protection authority of the Cypress Fire Protection District (Cypress Fire Protection District 2018) and is located in a "High" fire hazard severity zone within a State Responsibility Area (SRA), as delineated by the California Department of Forestry and Fire Protection (CALFIRE) "Monterey County Fire Hazard Severity Zones in SRA" (CALFIRE 2007). Adjacent areas both to the north, east, and south are located within the State Responsibility Area fire hazard map and are identified as within the "Very High" fire hazard severity zone. However, construction of new field lighting would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Hazards and hazardous materials will not be addressed further in the EIR.

10. HYDROLOGY AND WATER QUALITY

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? (1, 7)	☐	☐	☐	☒
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (1, 7)	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(1) Result in substantial erosion or siltation on- or off-site; (1, 7, 21)	☐	☐	☐	☒
(2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; (1, 7, 21)	☐	☐	☐	☒
(3) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (1, 7, 21)	☐	☐	☐	☒
(4) Impede or redirect flood flows? (1, 5, 7)	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (1, 2, 3, 5, 7, 21)	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (1, 7)	☐	☐	☐	☒

Comments:

- a. The proposed project would not involve construction or operational activities that would degrade or result in a violation of water quality standards.
- b. The proposed project would not involve construction or operational activities that would impact groundwater supplies or interfere with groundwater recharge.
- c. The project site does not contain any streams or rivers. The closest watercourse is an intermittent stream at the bottom of Hatton Canyon to the east. The proposed project involves the installation of new lighting poles at an existing high school stadium and would not alter the existing drainage pattern of the site or area.
- d. The proposed project is not located within a flood hazard zone, tsunami, or seiche zones, and therefore, would not risk release of pollutants due to project inundation.
- e. The proposed project involves minimal construction activities that would not require the use of water and therefore, would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Hydrology and water quality issues will not be addressed further in the EIR.

11. LAND USE AND PLANNING

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Physically divide an established community? (1, 7, 21)	☐	☐	☐	☒
b. Cause any significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (1, 7, 21)	☐	☐	☐	☒

Comments:

- a. The proposed project would not physically divide an established community.
- b. The proposed project is the installation of lighting at the existing high school and therefore, would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Environmental lighting effects will be evaluated in various sections of the EIR.

12. MINERAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (3)	☐	☐	☐	☒
b. Result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land-use plan? (3)	☐	☐	☐	☒

Comments:

- a, b. According to the County's general plan EIR Exhibit 4.5.1, portions of the Greater Monterey Peninsula Plan are designated MRZ-1, 2, 3 and 4 by the State Geologist. The project site is located within "MRZ-4," which applies to areas where available information is inadequate for assignment to any other zone (i.e., where there is not enough information available to determine the presence or absence of mineral deposits). The areas designated MRZ-4 include unincorporated areas on the outskirts of Monterey and Carmel, including the Carmel High School site, which has existed on this site since the 1940s and has presented no historic indication of mineral resource availability. Therefore, there would be no loss of availability of known mineral resources or locally important mineral resource recovery sites as a result of the proposed project.

Mineral resources will not be addressed further in the EIR.

13. NOISE

Would the project result in:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in applicable standards of other agencies? (1, 2, 3, 7)	☒	☐	☐	☐
b. Generation of excessive ground-borne vibration or ground borne noise levels? (1, 2, 3, 7)	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public-use airport, expose people residing or working in the project area to excessive noise levels? (16, 21)	☐	☐	☐	☒

Comments:

- a. Operational noise levels associated with the proposed project have the potential to increase over the existing stadium noise levels resulting from possible greater use of the stadium facilities that the new stadium lights may allow. Based on the location of the project site to surrounding sensitive receptors (such as the nearby residences), noise generation associated with construction could also be an issue. A noise evaluation of the proposed project will be prepared to address the potential for both operational and construction noise level increases and any resulting mitigation required to reduce noise levels to a less-than-significant level. The results of the noise evaluation will be presented in the EIR as well as any necessary mitigation to address noise impacts.
- b. Operational activities are not expected to result in any vibration impacts at nearby sensitive uses. Vibration from construction activities could be detected at the closest sensitive land uses, especially during movements by heavy equipment or loaded trucks and during some paving activities. Construction noise impacts, including impacts associated with groundborne vibrations, will be addressed in the EIR.

- c. The nearest airport to the project site is the Monterey Regional Airport, approximately four miles to the northeast. The project site is not located within an airport land-use plan, within two miles of a public airport, or within the vicinity of a private airstrip.

Operational and construction noise impacts, along with construction-related groundborne vibration impacts, as a result of the proposed project will be addressed in the EIR.

14. POPULATION AND HOUSING

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? (1, 7)	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (1, 7)	☐	☐	☐	☒

Comments:

a, b. The proposed project would not result in population growth, nor would it displace people or existing housing in the area.

Population and housing will not be addressed further in the EIR.

15. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection? (1, 7)	☐	☐	☐	☒
b. Police protection? (1, 7)	☐	☐	☐	☒
c. Schools? (1, 7)	☐	☐	☐	☒
d. Parks? (1, 7)	☐	☐	☐	☒
e. Other public facilities? (1, 7)	☐	☐	☐	☒

Comments:

- a, b. The proposed project is the installation of new field lighting at an existing high school stadium. The installation of new fielding lighting would not necessitate additional fire and police protection that would require the construction of new or physically altered fire and police facilities which would cause significant environmental impacts.
- c-e. The proposed project would not result in the need for additional school or park facilities, or other public facilities.

Public services impacts will not be addressed further in the EIR.

16. RECREATION

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (1, 7)	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (1, 7)	☐	☐	☐	☒

Comments:

- a. The installation of new field lighting would not increase the use of existing neighborhood and regional parks or other recreational facilities. In fact, the ability of the school district to conduct further games and practices at the high school stadium will result in less demand on other existing facilities maintained by both the school district and throughout the County.
- b. The proposed project includes the installation of new field lights at an existing high school stadium, in which case the construction and expanded use of the recreational facility may have an adverse physical effect on the environment. The construction of these new field lights, and any impacts and mitigation measures, will be the subject of the EIR.

The proposed project will not require the construction or expansion of other recreational facilities.

17. TRANSPORTATION

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (1, 7)	☒	☐	☐	☐
b. Conflict or be inconsistent with CEQA guidelines section 15064.3, subdivision (b)? (1, 7)	☒	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (1, 7)	☒	☐	☐	☐
d. Result in inadequate emergency access? (1, 7)	☒	☐	☐	☐

Comments:

- a, b. A transportation study will be prepared by Hexagon Transportation Consultants, which will include an evaluation of the project's potential impacts related to adopted Vehicle Miles Traveled (VMT) methodologies and impact criteria as required per the Governor's Office of Research and Planning (OPR) Technical Advisory guidance on the evaluation of transportation impacts in CEQA. The VMT assessment will consider OPR's guidelines and recommendations for the evaluation of VMT for CEQA. The results of the VMT analysis will be summarized in the EIR.
- c. The transportation study will also include a traffic operations analysis which will determine whether the project traffic would create or exacerbate operational issues, such as queueing, at intersections in the immediate project vicinity on Friday evenings, from 5:00 PM to 7:00 PM, which is when the traffic increase due to the project is expected to be greatest, and to determine whether any improvements would be necessary. The intersections to be studied are identified below:
1. State Route 1 and Carmel Hills Drive (unsignalized);
 2. State Route 1 and Ocean Avenue;
 3. State Route 1 and Carmel High School Entrance (unsignalized); and
 4. State Route 1 and Morse Drive (unsignalized).

The transportation study will also review the current high school layout and will determine where stadium users would park. Access to the parking areas and driveway operations will be evaluated. Based on the results of the intersection operations calculations, deficiencies due to the site-generated traffic will be identified and described. Recommendations will be formulated that identify the locations and types of improvements or modifications necessary to achieve acceptable traffic operations. The EIR will summarize the findings of the traffic operations analysis and identify both impacts and any necessary mitigation.

- d. The transportation report will address access issues, which will be addressed in the EIR.

18. TRIBAL CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources code section 5020.1(k), or ()	☒	☐	☐	☐
(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. ()	☒	☐	☐	☐

Comments:

- a. (1, 2) The CEQA statute as amended by Assembly Bill 52 (AB 52) (Public Resources Code Sections 21073 and 21074) defines “tribal cultural resources”, and “California Native American tribe” as a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission. Public Resources Code Section 21080.3.1 outlines procedures for tribal consultation as part of the environmental review process. As previously noted, on March 29, 2021, the school district sent an offer of consultation letter to the tribal representative of the Ohlone/Costanoan-Esselen Nation (OCEN). Should the tribal representative request consultation, the EIR will present the results of the tribal consultation process.

19. UTILITIES AND SERVICES SYSTEMS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (1, 7)	☐	☐	☐	☒
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (1, 7)	☐	☐	☐	☒
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (1, 7)	☐	☐	☐	☒
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (1, 7)	☐	☐	☐	☒
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (1, 7)	☐	☐	☐	☒

Comments:

- a. The proposed project would not require relocation or construction of new or expanded water, wastewater treatment, storm water drainage, natural gas, and telecommunication facilities. While the proposed project would result in increased need for electric power to service the new lighting poles, the project would not require the construction of additional electric power facilities that would cause significant environmental effects. This issue will not be addressed further in the EIR.
- b. The proposed project could increase use of the athletic field resulting in an increase in spectators at events. However, this increase would not result in a substantial increase

in water demand at the high school or impact the capacity of water supply facilities. No physical improvements would be necessary to serve the proposed project. This issue will not be addressed further in the EIR.

- c. The proposed project could increase use of the athletic field resulting in an increase in spectators at events. However, this increase would not result in a substantial increase in wastewater generation at the high school or impact the capacity of wastewater facilities. Therefore, there would be no impact on wastewater treatment facilities. No physical improvements would be necessary to serve the proposed project. This issue will not be addressed further in the EIR.
- d, e. The proposed project could increase use of the athletic field resulting in an increase in spectators at events. However, this increase would not result in a substantial increase in that would exceed the landfill capacity. No physical improvements to solid waste facilities would be necessary to serve the proposed project. This issue will not be addressed further in the EIR.

Utilities and service systems issues will not be addressed further in the EIR.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan? (18)	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire? (17, 18)	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (17, 18)	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? (17, 18)	☐	☐	☐	☒

Comments:

- a-d. As noted in Section D.9(g), the project site located in a “High” fire hazard severity zone within a State Responsibility Area (SRA), as delineated by the CALFIRE’s “Monterey County Fire Hazard Severity Zones in SRA Map” (CALFIRE 2007). While located in an SRA, the proposed project would not create or exacerbate conditions that would substantially increase wildfire risks to the project site. Therefore, this issue will not be evaluated further in the EIR.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory? (1, 2, 3, 5, 7, 19, 21, 22)	☒	☐	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects) (1, 7)	☒	☐	☐	☐
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? (1, 2, 3, 7)	☒	☐	☐	☐

Comments:

- a. The project's impacts on biological resources will be evaluated in the EIR. As noted in Section D.5, "Cultural Resources," a surface reconnaissance archaeological survey and records search showed no known sensitive cultural resources associated with major periods of California history or prehistory on or near the project site. However, the proposed project still has the potential to accidentally discover unknown buried historic resources or unique archaeological resources. Implementation of mitigation measures CR-1 and CR-2 would reduce these potentially significant impacts to a less-than-significant level. Therefore, cultural resource impacts will not be evaluated further in the EIR.

- b. The proposed project's cumulatively considerable impacts will be addressed in the EIR.
- c. The proposed project has the potential to result in adverse environmental effects that could cause substantial adverse effects on human beings from the following:
construction-related air quality and construction-related noise effects at nearby sensitive receptors that exceed air district air quality and County noise thresholds.
The project's air quality and noise effects will be evaluated in the EIR.

E. SOURCES

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NATIVE AMERICAN HERITAGE COMMISSION

Governor's Office of Planning & Research

May 17, 2021

May 21 2021

Dan Paul
Carmel Unified School District
4380 Carmel Valley Road
Carmel, CA 93923

STATE CLEARINGHOUSE

Re: 2021050293, Carmel High School Stadium Lights Project, Monterey County

Dear Mr. Paul:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

CHAIRPERSON
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SECRETARY
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AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
- b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Nancy.Gonzalez-Lopez@nahc.ca.gov.

Sincerely,



Nancy Gonzalez-Lopez
Cultural Resources Analyst

cc: State Clearinghouse

DEPARTMENT OF TRANSPORTATION

CALTRANS DISTRICT 5
50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3101
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TTY 711
www.dot.ca.gov/dist05/



Making Conservation
a California Way of Life.

May 26, 2021

MON-1-73.666
SCH#2021050293

Dan Paul, Director of Facilities & Transportation
Carmel Unified School District
4380 Carmel Valley Road
Carmel, CA 93923

Dear Mr. Paul:

COMMENTS FOR THE NOTICE OF PREPARATION (NOP) – CARMEL HIGH SCHOOL STADIUM
LIGHTS, CARMEL-BY-THE-SEA, CA

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the Carmel High School Stadium Lights project which proposes installing new lighting at the existing stadium at Carmel High School. Caltrans offers the following comments in response to the NOP:

1. Caltrans supports local development that is 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 and development. Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals.
2. As a result of Senate Bill (SB) 743, effective July 2020 Caltrans replaced vehicle level of service (LOS) with vehicle miles traveled (VMT) as the primary metric for identifying transportation impacts from local development. Additionally, the Caltrans Transportation Impact Study Guide (TISG) replaces the Guide for the Preparation of Traffic Impact Studies (Caltrans, 2002) and is for use with local land use projects. The focus now will be on how projects are expected to influence the overall amount of automobile use instead of traffic congestion as a significant impact. For more information, please visit:
<https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/sb-743>.

3. Employing VMT as the metric of transportation impact Statewide will help to promote Green House Gas (GHG) emission reductions consistent with SB 375 and can be achieved through influencing on-the-ground development. Implementation of this change will rely, in part, on local land use decisions to reduce GHG emissions associated with the transportation sector, both at the project level, and in long-term plans (including general plans, climate action plans, specific plans, and transportation plans) and supporting Sustainable Community Strategies developed under SB 375. In addition to any site-specific access or safety concerns with the project, it is likely that the Caltrans correspondence will focus attention on meeting overall VMT reducing goals.
4. Due to COVID-19, Caltrans policy on collecting traffic data has changed until further notice. Traffic analysis conducted for all projects on the State Highway System (SHS) are now required to use traffic data collected before March 13, 2020 to avoid abnormal traffic patterns. Traffic analysis and data usage will need to meet Caltrans standards of sound engineering justification and source documentation of historical traffic data. Additional information can be found at <https://dot.ca.gov/programs/traffic-operations>.
5. Please be aware that if any future work is completed in the State's right-of-way it will require an encroachment permit from Caltrans and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditions and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: <https://dot.ca.gov/caltrans-near-me/district-5/district-5-programs/d5-encroachment-permits>.

Thank you for the opportunity to review and comment on the proposed project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 835-6543 or at Christopher.Bjornstad@dot.ca.gov.

Sincerely,

Christopher Bjornstad

Chris Bjornstad
Associate Transportation Planner
District 5 Development Review

June 14, 2021

Dan Paul
Director of Facilities & Transportation
Carmel Unified School District
4380 Carmel Valley Road
Carmel, CA 93923

via email: dpaul@carmelunified.org

RE: Comments on Notice of Preparation of a Draft Environmental Impact Report for the Carmel High School Stadium Lights

Dear Mr. Paul:

The Transportation Agency for Monterey County is the Regional Transportation Planning and Congestion Management Agency for Monterey County. Agency staff have reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Carmel High School Stadium Lights.

The project requests the installation of new lighting on an existing athletic stadium immediately east of State Route 1. The project is expected to allow for Friday night football games and other nighttime games and practices in anticipation of the state's "late start law," which will go into effect starting in the fall of 2022 and will affect the ability of various sports teams from practicing later in the day without lights.

Agency staff offer the following comments for your consideration:

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, particularly along State Route 1 intersections from Carpenter Street to Carmel Valley Road.
2. The Agency supports the use of Intersections Control Evaluations (ICE analysis) to inform intersection design and when major modifications to intersections are considered. The Agency encourages the development of roundabouts to support traffic flow and the safety of cyclists and pedestrians when feasible.
3. The Agency encourages the study to evaluate all potential special events that might be conducted in the evenings, including (but not limited to): evening practices for sports teams, graduation ceremonies, club sporting events, and concerts. The EIR should identify steps needing to be taken before allowing unanticipated events to occur that were not evaluated in the study (e.g., conditions of approval requiring a study to be conducted if event is expected to generate more peak hour trips than evaluated in the EIR).
4. The Agency encourages consideration of safe bicycle and pedestrian connections to the project site. Consideration should be given to provide secure bicycle parking for people attending events at the Stadium.

5. Consideration should be given to the installation of electric vehicle charging stations, as new construction provides an opportunity to install this needed infrastructure.
6. The Agency recommends coordination with Monterey-Salinas Transit for consideration of transit connections to and from the Stadium. Monterey-Salinas Transit's *Designing for Transit Guideline Manual* should be used as a resource when considering potential transit access to the project site.
7. While not a direct transportation-related issue, the project should consider the inclusion of equipment that supports communication (e.g., conduits in the new poles that link power supplies to top of lights so that communication equipment could potentially be mounted).

Thank you for the opportunity to comment on the proposed project. If you have any questions, please contact Madilyn Jacobsen of my staff at (831) 775-4402 or madilyn@tamcmonterey.org.

Sincerely,



Debra L. Hale
Executive Director



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Ave
Fresno, California 93710
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



June 14th, 2021

Governor's Office of Planning & Research

June 14 2021

STATE CLEARINGHOUSE

Dan Paul
Director of Facilities and Transportation
Carmel Unified School District
4380 Carmel Valley Road
Carmel, California 93923

Subject: Carmel High School Stadium Lights
Notice of Preparation (NOP)
SCH No.: 2021050293

Dear Mr. Paul:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an NOP from Carmel Unified School District for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Dan Paul, Director of Facilities and Transportation
Carmel Unified School District
June 14th, 2021
Page 2

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code may be required.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

PROJECT DESCRIPTION SUMMARY

Proponent: Carmel Unified School District

Objective: The objective of the Project is to install new stadium lights on Carmel High School. Primary Project activities include installation of four new lights around the football field, with no additional improvements on campus. Two of the lighting poles will be on the north side of the field and will be 70 feet high, while the other two light poles will be on the south side and will be 80 feet high. Each lighting fixture will generate a total of 44 luminaires with an average of 68.82 kilowatts.

Location: 3600 Ocean Avenue, Carmel-by-the-Sea, California 93923. The new lights will be around the stadium on the south side of campus. APN#: 015-081-001

Timeframe: To be completed by the start of the 2022-2023 school year.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Carmel Unified School District in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

There are many special-status resources present in and adjacent to the Project area, due to the close proximity of the riparian habitat on the east side of campus. These resources may need to be evaluated and addressed prior to any approvals that would allow ground-disturbing activities or land use changes. The NOP indicates there is potentially significant impact unless mitigation measures are taken but the measures are not listed. CDFW is concerned regarding potential impacts to special-status species including, but

Dan Paul, Director of Facilities and Transportation
Carmel Unified School District
June 14th, 2021
Page 3

not limited to: the federally threatened California red-legged frog (*Rana draytonii*), the State endangered foothill yellow-legged frog (*Rana boylei*), species of special-status bats, and special-status plants, including the California Rare Plant Ranked (CRPR) 1B.1 Hickman's onion (*Allium hickmanii*), and CRPR 1B.1 Monterey clover (*Trifolium trichocalyx*). In order to adequately assess any potential impacts to biological resources, focused biological surveys should be conducted by a qualified wildlife biologist/botanist during the appropriate survey period(s) in order to determine whether any special-status species and/or suitable habitat features may be present within the Project area. Properly conducted biological surveys, and the information assembled from them, are essential to identify any mitigation, minimization, and avoidance measures and/or the need for additional or protocol-level surveys, especially in the areas not in irrigated agriculture, and to identify any Project-related impacts under CESA and other species of concern.

CDFW recommends that a qualified biologist assess if Project activities have the potential to impact special status species or suitable habitat prior to drafting the Draft Environmental Impact Report (DEIR) to determine if mitigation measures for special-status species are warranted. If potential impacts may occur, CDFW is available to meet with the Carmel Unified School District to discuss appropriate mitigation measures prior to completion of the DEIR. Please note that if foothill yellow-legged frog is detected during pre-construction surveys or at any time during construction, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization would be necessary prior to initiating ground-disturbing activities to comply with CESA. CDFW also recommends consulting with the USFWS on potential impacts to federally listed species including, but not limited to California red-legged frog. Take under FESA is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with FESA is advised well in advance of any ground-disturbing activities.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any -status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov.

The types of information reported to CNDDDB can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

Dan Paul, Director of Facilities and Transportation
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FILING FEES

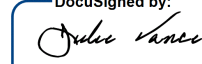
The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist Carmel Unified School District in identifying and mitigating Project impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>). Please see the enclosed Mitigation Monitoring and Reporting Program (MMRP) table which corresponds with recommended mitigation measures in this comment letter. Questions regarding this letter or further coordination should be directed to Aimee Braddock, Environmental Scientist at (559) 243-4014 extension 243 or aimee.braddock@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09EE08945A...
Julie A. Vance
Regional Manager

cc: Office of Planning and Research, State Clearinghouse, Sacramento



Dan Paul <dpaul@carmelunified.org>

Stadium Lights & EIR at CHS

1 message

Perry A.R. <coastalroots@gmail.com>
To: dpaul@carmelunified.org

Tue, May 25, 2021 at 3:41 PM

Hello.

I just learned of the stadium lights proposal for CHS and literally have 2 minutes to write this. Bottom line is--please, no!! The field and stadium lights in the area are already a sad disturbance for humans and nature both. Please, do not cause more light pollution to this precious place, for the sake of preserving dark skies to see stars, the habitat for all the nocturnal animals, and the viewshed.

Please, no more lights!!

Thank you for taking my comment.

Best,

P.A.R., Carmel resident

7 June 2021

RE NOP for proposed stadium lighting at Carmel High School

We strongly oppose stadium lights at CHS + advocate for alternative lower impact solutions

We are writing as long-time residents of the Carmel High School neighborhood who can confirm the findings of the NOP for the Environmental Impact Report showing a multitude of negative impacts on our community. We strongly oppose the proposed addition of stadium lights and advocate for alternative solutions that would be more energy efficient and have less detrimental impact on our neighborhood and the community at large.

Stadium lights are overkill to resolve the problem of late practice in the evening -- we ask the EIR to recommend exploring alternatives such as scheduling practice earlier in the day and other indoor classes at other times to balance. And/or to work with lighting specialists to design lower, shielded lighting to illuminate just the practice area and needs, avoiding the excessive energy use and adverse impact of tall stadium lights on the entire surroundings.

***More information is needed:** To adequately understand the impact of the proposed lighting plan, the Carmel community needs a detailed terrain map that would show the impact of the proposed lighting in terms of the range and intensity of glare and visibility of lighting poles from various neighborhoods and State and Regional Parks, as well as an assessment of impact on drivers on Hwy 1.

Our comments to confirm negative impacts of the NOP findings

1. **Background** Over the years we have worked with the Carmel Unified School District administration, along with lighting and acoustic consultants in order to mitigate existing problems at CHS. Even though shields have been added, current pool and building lights and buzzers still pose significant impact on the neighborhood. These existing issues with light and noise would be greatly amplified by the proposed plan. As architectural professionals, we can confirm that stadium lights will be extremely difficult to adequately mitigate, because of their height, wattage, location and the surrounding hilly terrain and coastal fog that extends the range of their impact. Let's try to solve problems ahead of time. It's better to design wisely rather than try to mitigate post-implementation.

2. **Compounded impact because of increased use--** all of the issues discussed below would be substantially increased with the use of stadium lights for daily practice instead of just six home games for football season. This impact would also be extended by other sports such as track and field and junior varsity that would be turning on these lights or even outside sports programs who have rented the fields in the past.

3. **The cultural/environmental context of Carmel** also presents unique challenges in terms of mitigation since lighting is strictly regulated in our community to preserve its connection to nature. There are no street lights or lit advertising signs. Stadium lights used for daily practice and expanded night games would effectively erase this environmental preservation.

4. **Impact on scenic corridor** — Visitors come to Carmel for its special qualities and connection to nature. Expanded regular use of stadium lights would impact visitors as well as residents at the gateway to Carmel and further south to Big Sur. Because the proposed stadium lights would be so close to Hwy 1 without screening, they would be impossible to mitigate to preserve the scenic character.

5. Neighborhood and community impact The light pollution from proposed stadium lights would spread to our property half a mile away, our surrounding neighborhood (including several small nursing homes), homes in the city of Carmel, Carmel Knolls, Carmel Rio Vista, the historic protected lands at Fish Ranch, mouth of the Valley along Carmel Valley Road, along with the scenic corridor at Hwy 1.

6. Negative impact on Regional Park, State Park and Land Trust: this amplified lighting would also impact the State Park at Hatton Canyon contiguous to our neighborhood with significant wildlife and riparian presence. Palo Corona Regional Park, across from the High School would also be affected -- on hillsides that are proposed for wilderness experiences. Attention would need to be paid to the impact on the State Park proposed the Native American cultural center at Odell Barn.

7. Increased traffic poses significant issues for our neighborhood given current increases in visitor use of Hwy 1 where we have bottlenecked and limited access, along with on-going wildfire access issues for safety routes and emergency services. Lower level lighting for practices only would not impact traffic and emergency access in the same way as big event night games would.

Past promises to the neighborhood + litigation issues might delay desired solutions

1. In a meeting with an earlier administration at the CUSD Superintendent's office, when neighborhood members expressed concern about wiring for the new playing field surface, we were told that when the high school acquired the land for the playing fields, CHS was required by the purchase agreement (or deed) to not add stadium lights because of their adverse effect on neighbors.

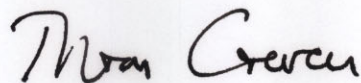
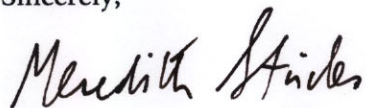
2. The proposed stadium lights would break promises made in the past to the community either by deed restriction or agreement and open up litigation issues that would be costly to taxpayers and delay solutions to the new state law.

Summary

We advocate for exploring and implementing alternatives to stadium lighting with less negative community and environmental impact.

As integral to our community, Carmel High School should be part of the community not dominate with excessive lighting and noise. The one-size-fits-all State Mandate for scheduling can be resolved in ways that better serve the particular context of our community by creative rescheduling and/or lower shielded lights without the far reaching negative impact on surroundings and on energy use.

Sincerely,



Meredith Stricker Thom Cowen
3830 Whitman Carmel CA 93923
visualpoetrystudios@gmail.com



Dan Paul <dpaul@carmelunified.org>

RE: SPORTS LIGHTING @ HIGH SCHOOL

1 message

Meredith Nole <ilight8@aol.com>

Tue, Jun 8, 2021 at 2:10 PM

Reply-To: Meredith Nole <ilight8@aol.com>

To: "dpaul@carmelunified.org" <dpaul@carmelunified.org>

Cc: Meredith Nole <ilight8@aol.com>

Hello,

I am a 43 year lighting professional, working with Industrial / Commercial Lighting projects.
I have consulted on sports lighting projects similar to this HS sport field lighting proposal.

I want to share - that no matter the glare shields used on the fixtures - there is no way that spillover lighting will not fall on residential households, especially with proposed height I have read about.

Most sport lighting manufacturers want to do the same thing - in every field lighting project - very tall poles, aiming for even distribution of lighting. Lighting up the air space here, I believe will be problematic & cause spillover lighting in residence.

I very much would like to see the specifications submitted for this project, I hope you will allow me to come take a look at the set of plans. I am "wondering " and will do some investigation - that as a high school - not TV or professional teams - does the lighting provided need to be of high level professional standards.

I believe it possible to illuminate the field, with lens & glare shields from lower angles - to eliminate air space lighting spillover. More on this option to follow.

In a separate email I will send you the lighting distribution pattern at MetLife Stadium - home of Giants & Jets.

Most important is the effects that nighttime spillover white light has on humans - both for health, sleep patterns, circadian rhythm & those health effects, as well as general discomfort on the population effected by the lighting. Again, 70-80 ft poles are not a good idea in this neighborhood..

Everyone wants the high schoolers to have a great time - that is not in question. I would request the lighting manufacturers you are working with to redesign their plan.

Thank you
Highest Regards

Meredith Nole, MIES
Monterey Lighting
Lighting Experts
Wholesale Suppliers
T-831-250-5623
C- 862-220-1406



Dan Paul <dpaul@carmelunified.org>

Stadium Lighting

1 message

MEREDITH NOLE <ilight8@aol.com>

Mon, Jun 14, 2021 at 3:58 PM

To: dpaul@carmelunified.org

Cc: Meredith Nole <ilight8@aol.com>

Hello,

I wanted to share that I'm investigating any potential for excellent quality illumination on the field for full seeability - using lower fixtures of some type - & absolutely no glare.

If I get good or interesting news I'll let you know.

Best

Meredith

Meredith Nole, MIES

Monterey Lighting

T. 831-250-5623

C.862-220-1406

LightingSpecialist

Wholesale Distributor

Carmel,CA. 93923

" Be kinder than necessary . . "

Sent from my iPhone



Dan Paul <dpaul@carmelunified.org>

Carmel High Sports Light Concerns

1 message

Jim Suchan <jim.suchan@gmail.com>
To: dpaul@carmelunified.org

Wed, Jun 9, 2021 at 11:53 AM

Mr. Paul,

I am writing for two reasons:

1. to indicate my significant concerns about the construction of Carmel High Stadium lights
2. to raise questions about the project

Concerns

My concerns about light pollution extending to homes on N. Carmel Hills Drive and the increase in noise due to evening sporting events will be addressed, I believe, in the EIR. What is not treated in the NOP and initial study is the parking, traffic and emergency vehicle problems that will be created on North Carmel Hills Dr. where I live.

My concern is that people attending sporting events will park on both sides of N. Carmel Hills and in the grassy medium between N. Carmel Hills and Highway 1. This situation turns N. Carmel Hills into a one-way street making it difficult, if not impossible, for emergency vehicles to have access to homes along the street. In addition, this situation makes it impossible to hold family and friends gatherings at our houses because there is no room to park. Cars parked in the grassy medium between Carmel Hills Dr. and Highway 1 tear up the vegetation, particularly during the rainy season, and have knocked several small trees planted to repair this area. This parking occurs despite No Parking signs prominently displayed in the area. Finally, the litter generated before and after the events is unightly. Carmel High makes no attempts to pick up litter generated by events it sponsors.

Questions about the Project

1. When, what times, and how often will either sporting events or practices be scheduled that require the lights
2. Can athletes have their school schedules arranged so that their last period is a study hall, thus enabling them to start practice 45 minutes earlier
3. Can practices be shortened by 30-45 minutes or structured so that some activities can be performed at dusk
4. Are there lighting options other than 70 and 80 feet light poles to illuminate the fields for practice.
5. Why can't football games and other outdoor sporting events remain scheduled during daylight hours
6. Is it not possible to shuttle spectators via buses from the Middle School where there is more than adequate parking

The families along N. Carmel Hills Dr. have been very tolerant of Carmel High activities that impact our street. For example, we have not called the police to ticket illegally parked cars during sporting events and have supported back to school nights and college night by not complaining about parking that clogs N. Carmel Hills Dr.

We strongly urge the Carmel High administration to rethink this stadium lights plan and consider redirecting the funds to academic programs.

Sincerely,

Jim Suchan

6/9/2021

Carmel Unified School District Mail - Carmel High Sports Light Concerns

[25225 N. Carmel Hills Dr](#)

Robert Martin

25215 N. Carmel Hills Dr



Dan Paul <dpaul@carmelunified.org>

Re: NOP CHS Stadium Lights

1 message

Darrah Blanton <darrahb@sbcglobal.net>
To: Dan Paul <dpaul@carmelunified.org>

Thu, Jun 10, 2021 at 11:56 AM

Dear Mr. Paul,

Please find attached our response to the Notice of Preparation dated 5/12/21. Thank you.
Darrah Blanton and Don Hubbard.

 **CUSD_nop.doc**
26K

To: Dan Paul, Director of Facilities and Transportation
Carmel Unified School District
4830 Carmel Valley Road
Carmel, CA 93923

Date: June 10, 2021 (Hand delivered)

Dear Mr. Paul,

In response to the Notice of Preparation dated May 12, 2021 regarding CHS Stadium Lights, we would like to offer dissenting opinion. We live two houses south of the tennis courts. CHS was a good neighbor for 35 years as were we. In, 2019 CHS Baseball Coach, Mike Kelly came to us to inform us that CHS would be moving the batting cage to the outfield line. He never revealed the scope of the project to be a “state of the art baseball training facility” nor was an EIR prepared. Since the environmental enjoyment of our community has been severely impacted by grating noise up to six hours a day, we wish to proactively object to the proposed stadium lights.

The major impact will be light pollution. Carmel doesn’t even have street lights and residents enjoy the natural progression of darkness which occurs here. The lights at the pool illuminate the sky brightly so the much more powerfully radiance of stadium lights would be worse. The lights would be used not only for “Friday Night Lights” football but for sports practices year round when needed. Football has been very successfully played on Saturdays for over 50 years and can continue to occur into the future. Night time games can provide an arena for our kids and fans to celebrate with alcohol. The proximity of the field to Highway One could precipitate driving under the influence and accidents which are much more likely to occur at night than during daytime games.

Seventy foot lights are visually disturbing as well. The architecture of CHS hugs the terrain (especially before construction of the Performing Arts Center) so the lights would stick out like sore thumbs from the slope of the campus.

The fiscal impact to CUSD should also be considered. Extended litigation, and the concurrent expense, which Monterey District has encountered with stadium lights at their high school should be a warning to our district.

Please place us of the mailing list noted in the NOP. Please consider substantial impacts outlined in the initial study. Thank you for your consideration of our objection and the substantial impact the project would impose on our residential neighborhood.

Sincerely,

Darrah Blanton and Don Hubbard
25561 Morse Drive, Carmel, CA 93923
darrahb@sbcglobal.net



Dan Paul <dpaul@carmelunified.org>

Carmel High School Stadium Lights1 message

Ann Taylor <anntaylor59@comcast.net>
To: dpaul@carmelunified.org

Sun, Jun 13, 2021 at 4:49 PM

Dan Paul
Director of Facilities and Transportation
Carmel Unified School District

I am writing on behalf of my mother Yoko Taylor who resides at 25539 Morse Drive, Carmel, CA. We have reviewed the Notice of Preparation of Draft Environmental Impact Report Carmel High School Stadium Lights. As we live below the Carmel High School, we anticipate a significant impact on our quality of life due to the intrusion of stadium lights into our home. I understand you are trying to accommodate the impact of the state's late start law, but we believe that once the stadium lights are put into place, the occasional Friday night games and practices will eventually become a nightly affair and our privacy will be impacted. Additionally, the late start law may change and go back to regular start but once the stadium lights are in place, it is unlikely any consideration will be made to reduce the usage of stadium lights.

We are OPPOSED to the construction of the stadium lights.

Ann Taylor
Sent from my iPad



Dan Paul <dpaul@carmelunified.org>

High School Lights

1 message

jayteesr2 <jayteesr@gmail.com>
To: dpaul@carmelunified.org

Mon, Jun 14, 2021 at 4:56 PM

Dear Mr. Paul,

We recently learned of the request for input to the scope of the EIR for the high school football field lights. Today we listened to the presentation and comments at the CUSD Board Meeting on May 26 and would like to weigh in on the scope.

We request that the EIR evaluation of the visual impact of the lights include the community of neighbors in the Carmel Views residential area. Many of the homes here were negatively affected by the first set of pool lights back in 2007. You and Karl Pallastrini worked with us and a new design was installed. We thank you.

We now have concerns again since no input from Carmel Views residents was requested for the EIR to our knowledge. We would like to be informed from the beginning. The 80 foot tall lights from the south end of the field in particular could be a problem, and we request a technical evaluation of the impact on the homes in our neighborhood.

Sincerely,

Joseph and Marjorie Longo



Dan Paul <dpaul@carmelunified.org>

Carmel High School Lights v. Night Sky

1 message

larry@mntntools.com <larry@mntntools.com>

Tue, Jun 15, 2021 at 5:30 PM

To: dpaul@carmelunified.org

Cc: president@carmelvalleyassociation.org, district5@co.monterey.ca.us, mhcity@montereyherald.com, cvcboard@gmail.com

In response to the article printed in the May 21, 2021 Pine Cone:

We are opposed to the installation and increased use of artificial lighting at the Carmel High School for the following reasons:

1. More lighting will enable and encourage more use of the stadium and more noise generated during the traditionally quiet time surrounding the dinner hour and early evenings. We already are impacted by night lighting for sports plus general area lighting and interior lighting and school bus lights early morning and evening.
2. More lighting will further interrupt our enjoyment of the "night sky". As the "mouth of Carmel Valley" has developed, we already have too many bright lights detracting from the natural night view of mountains, trees, the night sky, and the view of Point Lobos State Reserve and adjoining coast line. We do not want any more.
3. Current bright metal light standards are already far too visible (why not paint them a dull color to camouflage them and blend into their background)?
4. As stated Highway 1 has been defined by the State as a Scenic Route. As such any impact to native views should be carefully and conservatively evaluated - such as unnatural lighting which should be generally prohibited.
5. Proposed 70 - 80 foot tall light standards for "stadium lights" are taller than the areas surrounding trees and would be an eyesore on the natural landscape 24 hours a day - lit or not.
6. Impact and degradation of residential viewsheds should clearly be avoided. Additional infrastructure impacting existing views reduce owner's enjoyment of their private property and also value of same. This includes a large number of homes along Scenic State Highway 1, and in the adjoining neighborhoods of "the Mesa" (Atherton and surrounding streets), Hatton Fields (and surrounding streets), properties East of the High School along Flanders Dr and connecting streets and sub divisions of Carmel Views, Rancho Rio Vista, Carmel Knolls, Red Wolf area and generally the "mouth" of Carmel Valley.

Any decline of Property values (which are the basis for property taxes) could have a negative net affect on Monterey County's tax revenue, affecting critical services and infrastructure repair and maintenance.

For these reasons and others, we strongly discourage any more lights be installed at Carmel High School or anywhere along our Scenic State Highway 1.

Sincerely,
Larry Arthur
Jane Goldcamp
Carmel, CA

cc: EMC Planning, CV Association, District 5, Coastal Commission, Ohlone Coastanonan Esselen, Cal Trans District 5, Carmel Views Community Association, Rancho Rio Vista

APPENDIX B

NOAA SUNRISE/SUNSET TABLES FOR 2021

Sunrise Table for 2021

Location: Latitude 36.55600 Longitude -121.91091

Time Zone Offset: America/Los_Angeles -7.0

All times are in local time. Cells with light green color indicate when daylight savings time is in effect.

Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	07:20	07:09	06:38	06:53	06:14	05:51	05:53	06:14	06:39	07:03	07:31	07:01
2	07:20	07:08	06:36	06:52	06:13	05:50	05:54	06:15	06:40	07:04	07:32	07:02
3	07:20	07:07	06:35	06:50	06:11	05:50	05:54	06:16	06:41	07:05	07:33	07:03
4	07:20	07:06	06:34	06:49	06:10	05:50	05:55	06:17	06:42	07:06	07:34	07:04
5	07:20	07:05	06:32	06:47	06:09	05:50	05:55	06:17	06:42	07:07	07:35	07:05
6	07:20	07:05	06:31	06:46	06:08	05:49	05:56	06:18	06:43	07:07	07:36	07:06
7	07:20	07:04	06:29	06:44	06:07	05:49	05:56	06:19	06:44	07:08	06:37	07:07
8	07:20	07:03	06:28	06:43	06:06	05:49	05:57	06:20	06:45	07:09	06:38	07:08
9	07:20	07:02	06:27	06:42	06:05	05:49	05:57	06:21	06:46	07:10	06:39	07:08
10	07:20	07:01	06:25	06:40	06:05	05:49	05:58	06:21	06:46	07:11	06:41	07:09
11	07:20	07:00	06:24	06:39	06:04	05:49	05:59	06:22	06:47	07:12	06:42	07:10
12	07:19	06:58	06:22	06:37	06:03	05:49	05:59	06:23	06:48	07:13	06:43	07:11
13	07:19	06:57	06:21	06:36	06:02	05:49	06:00	06:24	06:49	07:13	06:44	07:11
14	07:19	06:56	07:19	06:35	06:01	05:49	06:01	06:25	06:49	07:14	06:45	07:12
15	07:19	06:55	07:18	06:33	06:00	05:49	06:01	06:26	06:50	07:15	06:46	07:13
16	07:18	06:54	07:16	06:32	06:00	05:49	06:02	06:26	06:51	07:16	06:47	07:13
17	07:18	06:53	07:15	06:31	05:59	05:49	06:03	06:27	06:52	07:17	06:48	07:14
18	07:18	06:52	07:14	06:29	05:58	05:49	06:03	06:28	06:53	07:18	06:49	07:15
19	07:17	06:50	07:12	06:28	05:57	05:49	06:04	06:29	06:53	07:19	06:50	07:15
20	07:17	06:49	07:11	06:27	05:57	05:49	06:05	06:30	06:54	07:20	06:51	07:16
21	07:16	06:48	07:09	06:26	05:56	05:50	06:06	06:30	06:55	07:21	06:52	07:16
22	07:16	06:47	07:08	06:24	05:55	05:50	06:06	06:31	06:56	07:22	06:53	07:17
23	07:15	06:46	07:06	06:23	05:55	05:50	06:07	06:32	06:57	07:23	06:54	07:17
24	07:15	06:44	07:05	06:22	05:54	05:50	06:08	06:33	06:57	07:24	06:55	07:17
25	07:14	06:43	07:03	06:21	05:54	05:51	06:09	06:34	06:58	07:25	06:56	07:18
26	07:13	06:42	07:02	06:19	05:53	05:51	06:09	06:34	06:59	07:26	06:57	07:18
27	07:13	06:40	07:00	06:18	05:53	05:52	06:10	06:35	07:00	07:26	06:58	07:19
28	07:12	06:39	06:59	06:17	05:52	05:52	06:11	06:36	07:01	07:27	06:59	07:19
29	07:11		06:57	06:16	05:52	05:52	06:12	06:37	07:02	07:28	07:00	07:19
30	07:11		06:56	06:15	05:51	05:53	06:13	06:38	07:02	07:29	07:01	07:19
31	07:10		06:54		05:51		06:13	06:38		07:30		07:20

Sunset Table for 2021

Location: Latitude 36.55600 Longitude -121.91091

Time Zone Offset: America/Los_Angeles -7.0

All times are in local time. Cells with light green color indicate when daylight savings time is in effect.

Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	17:03	17:34	18:03	19:30	19:56	20:21	20:30	20:13	19:35	18:50	18:10	16:52
2	17:04	17:35	18:04	19:31	19:57	20:21	20:30	20:12	19:34	18:49	18:09	16:52
3	17:05	17:36	18:04	19:32	19:58	20:22	20:30	20:11	19:32	18:48	18:08	16:52
4	17:06	17:37	18:05	19:33	19:59	20:23	20:29	20:10	19:31	18:46	18:07	16:52
5	17:07	17:38	18:06	19:34	20:00	20:23	20:29	20:09	19:29	18:45	18:07	16:52
6	17:07	17:39	18:07	19:34	20:01	20:24	20:29	20:08	19:28	18:43	18:06	16:52
7	17:08	17:40	18:08	19:35	20:01	20:24	20:29	20:07	19:26	18:42	17:05	16:52
8	17:09	17:41	18:09	19:36	20:02	20:25	20:29	20:06	19:25	18:40	17:04	16:52
9	17:10	17:43	18:10	19:37	20:03	20:25	20:28	20:05	19:23	18:39	17:03	16:52
10	17:11	17:44	18:11	19:38	20:04	20:26	20:28	20:04	19:22	18:38	17:02	16:52
11	17:12	17:45	18:12	19:39	20:05	20:26	20:28	20:03	19:20	18:36	17:01	16:52
12	17:13	17:46	18:13	19:40	20:06	20:27	20:27	20:02	19:19	18:35	17:01	16:53
13	17:14	17:47	18:14	19:41	20:07	20:27	20:27	20:00	19:17	18:33	17:00	16:53
14	17:15	17:48	19:14	19:41	20:07	20:27	20:26	19:59	19:16	18:32	16:59	16:53
15	17:16	17:49	19:15	19:42	20:08	20:28	20:26	19:58	19:14	18:31	16:59	16:53
16	17:17	17:50	19:16	19:43	20:09	20:28	20:25	19:57	19:13	18:29	16:58	16:54
17	17:18	17:51	19:17	19:44	20:10	20:28	20:25	19:55	19:11	18:28	16:57	16:54
18	17:19	17:52	19:18	19:45	20:11	20:29	20:24	19:54	19:10	18:27	16:57	16:54
19	17:20	17:53	19:19	19:46	20:11	20:29	20:23	19:53	19:08	18:26	16:56	16:55
20	17:21	17:54	19:20	19:47	20:12	20:29	20:23	19:52	19:07	18:24	16:56	16:55
21	17:22	17:55	19:21	19:47	20:13	20:29	20:22	19:50	19:05	18:23	16:55	16:56
22	17:23	17:56	19:22	19:48	20:14	20:30	20:22	19:49	19:04	18:22	16:55	16:56
23	17:24	17:57	19:22	19:49	20:15	20:30	20:21	19:48	19:02	18:21	16:54	16:57
24	17:25	17:58	19:23	19:50	20:15	20:30	20:20	19:46	19:01	18:19	16:54	16:57
25	17:27	17:59	19:24	19:51	20:16	20:30	20:19	19:45	18:59	18:18	16:54	16:58
26	17:28	18:00	19:25	19:52	20:17	20:30	20:18	19:44	18:58	18:17	16:53	16:59
27	17:29	18:01	19:26	19:53	20:17	20:30	20:18	19:42	18:56	18:16	16:53	16:59
28	17:30	18:02	19:27	19:54	20:18	20:30	20:17	19:41	18:55	18:15	16:53	17:00
29	17:31		19:28	19:54	20:19	20:30	20:16	19:39	18:53	18:14	16:52	17:01
30	17:32		19:28	19:55	20:20	20:30	20:15	19:38	18:52	18:13	16:52	17:02
31	17:33		19:29		20:20		20:14	19:37		18:11		17:02

Solar Noon Table for 2021

Location: Latitude 36.55600 Longitude -121.91091

Time Zone Offset: America/Los_Angeles -7.0

All times are in local time. Cells with light green color indicate when daylight savings time is in effect.

Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	12:11:29	12:21:18	12:19:51	13:11:19	13:04:41	13:05:35	13:11:38	13:13:57	13:07:29	12:57:08	12:51:10	11:56:53
2	12:11:57	12:21:25	12:19:39	13:11:01	13:04:34	13:05:45	13:11:50	13:13:53	13:07:10	12:56:49	12:51:09	11:57:16
3	12:12:24	12:21:32	12:19:26	13:10:44	13:04:28	13:05:55	13:12:01	13:13:48	13:06:50	12:56:30	12:51:10	11:57:40
4	12:12:51	12:21:37	12:19:13	13:10:27	13:04:23	13:06:05	13:12:11	13:13:42	13:06:30	12:56:12	12:51:11	11:58:05
5	12:13:18	12:21:42	12:18:59	13:10:10	13:04:18	13:06:16	13:12:22	13:13:36	13:06:10	12:55:54	12:51:12	11:58:30
6	12:13:44	12:21:45	12:18:45	13:09:53	13:04:14	13:06:27	13:12:32	13:13:29	13:05:50	12:55:36	12:51:15	11:58:55
7	12:14:10	12:21:48	12:18:30	13:09:36	13:04:10	13:06:38	13:12:41	13:13:22	13:05:29	12:55:19	11:51:19	11:59:21
8	12:14:35	12:21:51	12:18:15	13:09:19	13:04:07	13:06:50	13:12:50	13:13:14	13:05:09	12:55:02	11:51:23	11:59:48
9	12:15:00	12:21:52	12:18:00	13:09:03	13:04:04	13:07:02	13:12:59	13:13:05	13:04:48	12:54:45	11:51:28	12:00:14
10	12:15:24	12:21:53	12:17:44	13:08:47	13:04:02	13:07:14	13:13:07	13:12:56	13:04:27	12:54:29	11:51:34	12:00:42
11	12:15:47	12:21:53	12:17:29	13:08:32	13:04:01	13:07:26	13:13:15	13:12:46	13:04:06	12:54:14	11:51:41	12:01:09
12	12:16:10	12:21:52	12:17:12	13:08:16	13:04:00	13:07:38	13:13:23	13:12:36	13:03:45	12:53:59	11:51:49	12:01:37
13	12:16:33	12:21:50	12:16:56	13:08:01	13:04:00	13:07:51	13:13:30	13:12:25	13:03:23	12:53:44	11:51:58	12:02:06
14	12:16:54	12:21:47	13:16:39	13:07:46	13:04:00	13:08:04	13:13:36	13:12:13	13:03:02	12:53:30	11:52:08	12:02:34
15	12:17:15	12:21:44	13:16:22	13:07:32	13:04:01	13:08:16	13:13:42	13:12:01	13:02:41	12:53:17	11:52:18	12:03:03
16	12:17:36	12:21:40	13:16:05	13:07:18	13:04:02	13:08:29	13:13:48	13:11:49	13:02:19	12:53:04	11:52:29	12:03:32
17	12:17:55	12:21:36	13:15:48	13:07:05	13:04:04	13:08:42	13:13:52	13:11:36	13:01:58	12:52:52	11:52:41	12:04:02
18	12:18:14	12:21:31	13:15:30	13:06:51	13:04:07	13:08:55	13:13:57	13:11:23	13:01:36	12:52:40	11:52:54	12:04:31
19	12:18:32	12:21:25	13:15:13	13:06:38	13:04:10	13:09:08	13:14:01	13:11:09	13:01:15	12:52:29	11:53:08	12:05:01
20	12:18:50	12:21:18	13:14:55	13:06:26	13:04:13	13:09:22	13:14:04	13:10:54	13:00:54	12:52:19	11:53:23	12:05:31
21	12:19:07	12:21:11	13:14:37	13:06:14	13:04:18	13:09:35	13:14:07	13:10:39	13:00:32	12:52:09	11:53:38	12:06:00
22	12:19:23	12:21:03	13:14:19	13:06:03	13:04:22	13:09:48	13:14:09	13:10:24	13:00:11	12:52:00	11:53:54	12:06:30
23	12:19:38	12:20:54	13:14:01	13:05:52	13:04:27	13:10:00	13:14:10	13:10:08	12:59:50	12:51:52	11:54:11	12:07:00
24	12:19:52	12:20:45	13:13:43	13:05:41	13:04:33	13:10:13	13:14:11	13:09:52	12:59:29	12:51:44	11:54:29	12:07:30
25	12:20:06	12:20:35	13:13:25	13:05:31	13:04:39	13:10:26	13:14:12	13:09:35	12:59:09	12:51:37	11:54:47	12:07:59
26	12:20:19	12:20:25	13:13:07	13:05:21	13:04:46	13:10:39	13:14:11	13:09:18	12:58:48	12:51:31	11:55:07	12:08:29
27	12:20:31	12:20:14	13:12:49	13:05:12	13:04:53	13:10:51	13:14:11	13:09:01	12:58:28	12:51:25	11:55:27	12:08:58
28	12:20:42	12:20:03	13:12:31	13:05:03	13:05:01	13:11:03	13:14:09	13:08:43	12:58:07	12:51:21	11:55:47	12:09:27
29	12:20:52		13:12:13	13:04:55	13:05:09	13:11:15	13:14:07	13:08:25	12:57:47	12:51:17	11:56:09	12:09:56
30	12:21:02		13:11:55	13:04:48	13:05:17	13:11:27	13:14:05	13:08:07	12:57:28	12:51:14	11:56:31	12:10:25
31	12:21:10		13:11:37		13:05:26		13:14:01	13:07:48		12:51:12		12:10:54

APPENDIX C

CALEEMOD RESULTS

CHS Football Field Lights Existing Conditions - Monterey County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

CHS Football Field Lights Existing Conditions - Avg 500 Attendees Per Event
Monterey County, Annual

1.0 Project Characteristics**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Popula
Arena	3.80	Acre	3.80	165,528.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	3.6	Precipitation Freq (Days)	55
Climate Zone	4			Operational Year	2021
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MW hr)	203.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

1.3 User Entered Comments & Non-Default Data

Vehicle Trips - Based on Hexagon Email 062121 Trip gen

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.00	6.4920e-003
tblFleetMix	LDA	0.00	0.50
tblFleetMix	LDT1	0.00	0.05
tblFleetMix	LDT2	0.00	0.20
tblFleetMix	LHD1	0.00	0.03
tblFleetMix	LHD2	0.00	7.6300e-003
tblFleetMix	MCY	0.00	0.02
tblFleetMix	MDV	0.00	0.17
tblFleetMix	MH	0.00	3.5890e-003

CHS Football Field Lights Existing Conditions - Monterey County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblFleetMix	MHD	0.00	0.01
tblFleetMix	OBUS	0.00	1.7330e-003
tblFleetMix	SBUS	0.00	1.5740e-003
tblFleetMix	UBUS	0.00	5.2500e-004
tblProjectCharacteristics	CH4IntensityFactor	0	0.033
tblProjectCharacteristics	CO2IntensityFactor	0	203.98
tblProjectCharacteristics	N2OIntensityFactor	0	0.004
tblProjectCharacteristics	PrecipitationFrequency	0	55
tblProjectCharacteristics	WindSpeed	0	3.6
tblVehicleTrips	WD_TR	33.33	16.32

2.0 Emissions Summary

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mobile	0.0242	0.0333	0.2073	3.7000e-004	0.0320	4.4000e-004	0.0324	8.5600e-003	4.1000e-004	8.9700e-003	0.0000	34.0200	34.0200	2.8000e-003	1.9300e-003	34.6658

4.0 Operational Detail - Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Unmitigated	0.0242	0.0333	0.2073	3.7000e-004	0.0320	4.4000e-004	0.0324	8.5600e-003	4.1000e-004	8.9700e-003	0.0000	34.0200	34.0200	2.8000e-003	1.9300e-003	34.6658

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Arena	62.02	0.00	0.00	86,022	86,022

CHS Football Field Lights Existing Conditions - Monterey County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Total	62.02	0.00	0.00	86,022	86,022
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CHS Football Field Lighting Project Proposed Conditions - Monterey County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

CHS Football Field Lighting Project Proposed Conditions - Avg 800 Attendees per Event

Monterey County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Arena	3.80	Acre	3.80	165,528.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	3.6	Precipitation Freq (Days)	55
Climate Zone	4			Operational Year	2022
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MW hr)	203.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Vehicle Trips - From Hexagaon Email Trip Gen 062121

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	18.00	1.00
tblConstructionPhase	NumDays	230.00	1.00
tblConstructionPhase	NumDays	20.00	1.00
tblConstructionPhase	NumDays	8.00	1.00
tblConstructionPhase	NumDays	18.00	1.00
tblConstructionPhase	NumDays	5.00	1.00

CHS Football Field Lighting Project Proposed Conditions - Monterey County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblConstructionPhase	PhaseEndDate	8/11/2022	7/19/2022
tblConstructionPhase	PhaseEndDate	6/22/2022	8/5/2021
tblConstructionPhase	PhaseEndDate	7/16/2021	6/21/2021
tblConstructionPhase	PhaseEndDate	8/4/2021	7/26/2021
tblConstructionPhase	PhaseEndDate	7/18/2022	6/23/2022
tblConstructionPhase	PhaseEndDate	7/23/2021	7/19/2021
tblGrading	AcresOfGrading	1.00	8.00
tblGrading	AcresOfGrading	1.50	7.50
tblVehicleTrips	WD_TR	33.33	26.05

2.0 Emissions Summary

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mobile	0.0361	0.0473	0.3083	5.7000e-004	0.0511	5.8000e-004	0.0516	0.0137	5.5000e-004	0.0142	0.0000	52.6126	52.6126	4.1900e-003	2.9000e-003	53.5829
Waste						0.0000	0.0000		0.0000	0.0000	0.0670	0.0000	0.0670	3.9600e-003	0.0000	0.1660
Water						0.0000	0.0000		0.0000	0.0000	1.6229	2.6667	4.2896	0.1671	3.9900e-003	9.6560
Total	0.8210	0.2597	0.4868	1.8400e-003	0.0511	0.0167	0.0678	0.0137	0.0167	0.0304	1.6899	410.5864	412.2763	0.1998	0.0136	421.3128

4.0 Operational Detail - Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

CHS Football Field Lighting Project Proposed Conditions - Monterey County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Unmitigated	0.0361	0.0473	0.3083	5.7000e-004	0.0511	5.8000e-004	0.0516	0.0137	5.5000e-004	0.0142	0.0000	52.6126	52.6126	4.1900e-003	2.9000e-003	53.5829
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4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Arena	98.99	0.00	0.00	137,309	137,309
Total	98.99	0.00	0.00	137,309	137,309

APPENDIX D

EMFAC RESULTS

APPENDIX # EMFACv2021

Carmel Highschool Football Field Lighting Project Fuel Demand Proposed Conditions - 2022

Vehicle Class	Fuel	Process	Kgal/day		
All Other Buses	Dsl	IDLEX	1.78E-07		
All Other Buses	Dsl	RUNEX	1.89E-05	Diesel Fuel Demand	8.25E-04 kgal/day
LDA	Dsl	RUNEX	2.12E-05		3.01E+02 gal/yr
LDT1	Dsl	RUNEX	2.04E-07		
LDT2	Dsl	RUNEX	1.06E-05		
LHD1	Dsl	IDLEX	2.35E-06	Gas Fuel Demand	0.014684 kgal/day
LHD1	Dsl	RUNEX	0.000395	(includes hybrids)	5359.649 gal/yr
LHD2	Dsl	IDLEX	1.44E-06		
LHD2	Dsl	RUNEX	0.000191	Total	5.66E+03 gal/yr
MDV	Dsl	RUNEX	5.50E-05		
Motor Coach	Dsl	IDLEX	2.43E-06	Proposed Annual VMT	137,309
Motor Coach	Dsl	RUNEX	5.73E-05		
SBUS	Dsl	IDLEX	5.56E-06	MPG Check	2.43E+01
SBUS	Dsl	RUNEX	6.36E-05	24.3 mpg	
LDA	Gas	RUNEX	0.005592		
LDA	Gas	STREX	0.000178		
LDT1	Gas	RUNEX	0.000663		
LDT1	Gas	STREX	2.53E-05		
LDT2	Gas	RUNEX	0.003412		
LDT2	Gas	STREX	0.000111		
LHD1	Gas	IDLEX	3.34E-06		
LHD1	Gas	RUNEX	0.000882		
LHD1	Gas	STREX	1.04E-05		
LHD2	Gas	IDLEX	5.08E-07		
LHD2	Gas	RUNEX	0.000129		
LHD2	Gas	STREX	1.40E-06		
MDV	Gas	RUNEX	0.003425		
MDV	Gas	STREX	0.000116		
SBUS	Gas	IDLEX	2.05E-06		
SBUS	Gas	RUNEX	5.54E-05		
SBUS	Gas	STREX	2.33E-07		
LDA	Phe	RUNEX	6.22E-05		
LDA	Phe	STREX	2.71E-06		
LDT1	Phe	RUNEX	1.02E-07		
LDT1	Phe	STREX	5.14E-09		
LDT2	Phe	RUNEX	5.70E-06		
LDT2	Phe	STREX	3.08E-07		
MDV	Phe	RUNEX	5.14E-06		
MDV	Phe	STREX	3.42E-07		

APPENDIX # EMFACv2021

Carmel Highschool Football Field Lighting Project Fuel Demand Existing Conditions - 2021

Vehicle Class	Fuel	Process	Kgal/day		
All Other Buses	Dsl	IDLEX	1.15E-07		
All Other Buses	Dsl	RUNEX	1.20E-05	Diesel Fuel Demand	5.35E-04 kgal/day
LDA	Dsl	RUNEX	1.43E-05	Diesel Annual Demand	1.95E+02 gal/yr
LDT1	Dsl	RUNEX	1.46E-07		
LDT2	Dsl	RUNEX	6.51E-06		
LHD1	Dsl	IDLEX	1.54E-06		
LHD1	Dsl	RUNEX	0.000258		
LHD2	Dsl	IDLEX	9.33E-07	Gas Fuel Demand	9.43E-03 kgal/day
LHD2	Dsl	RUNEX	0.000123	(Includes hybrids)	3.44E+03 gal/yr
MDV	Dsl	RUNEX	3.52E-05		
Motor Coach	Dsl	IDLEX	1.56E-06		
Motor Coach	Dsl	RUNEX	3.63E-05	Total Fuel Demand	3.64E+03 gal/yr
SBUS	Dsl	IDLEX	3.55E-06	3,640 gallons per year	
SBUS	Dsl	RUNEX	4.09E-05		
LDA	Gas	RUNEX	0.003576	Annual VMT	86,022
LDA	Gas	STREX	0.000117		
LDT1	Gas	RUNEX	0.000437	MPG check:	2.36E+01
LDT1	Gas	STREX	1.71E-05	23.6 mpg	
LDT2	Gas	RUNEX	0.002138		
LDT2	Gas	STREX	7.09E-05		
LHD1	Gas	IDLEX	2.19E-06		
LHD1	Gas	RUNEX	0.000575		
LHD1	Gas	STREX	6.79E-06		
LHD2	Gas	IDLEX	3.36E-07		
LHD2	Gas	RUNEX	8.56E-05		
LHD2	Gas	STREX	9.31E-07		
MDV	Gas	RUNEX	0.002214		
MDV	Gas	STREX	7.67E-05		
SBUS	Gas	IDLEX	1.36E-06		
SBUS	Gas	RUNEX	3.61E-05		
SBUS	Gas	STREX	1.54E-07		
LDA	Phe	RUNEX	3.45E-05		
LDA	Phe	STREX	1.50E-06		
LDT1	Phe	RUNEX	3.02E-08		
LDT1	Phe	STREX	1.47E-09		
LDT2	Phe	RUNEX	2.48E-06		
LDT2	Phe	STREX	1.32E-07		
MDV	Phe	RUNEX	2.78E-06		
MDV	Phe	STREX	1.83E-07		

APPENDIX E

ENVIRONMENTAL NOISE ASSESSMENT, PREPARED BY WJV
ACOUSTICS, INC. (DATED JULY 6, 2021)

ENVIRONMENTAL NOISE ASSESSMENT

**CARMEL HIGH SCHOOL
STADIUM FIELD LIGHTS**

WJVA Report No. 21-16

PREPARED FOR

**EMC PLANNING
301 LIGHTHOUSE AVENUE, SUITE C
MONTEREY, CA 93940**

PREPARED BY

**WJV ACOUSTICS, INC.
VISALIA, CALIFORNIA**



wjv acoustics

JULY 6, 2021

1. INTRODUCTION

Project Description

The Carmel Unified School District (school district) is proposing to install field lighting at the existing stadium at Carmel High School. No additional improvements are proposed. Two of the lighting poles will be located behind the northern, home seating area and will extend 70 feet high accounting for a 10-foot higher grade than the south, visitor seating bleachers, which will be 80 feet high. Each pole will be on a pre-cast concrete base approximately 10 feet below ground. Each lighting pole will feature three separate luminaires. The project site plan (illumination summary) is provided as Figure 1.

The addition of the stadium lights is primarily intended to allow for Friday night football games and other nighttime games and practices in anticipation of the state's "late start law," which will go into effect starting in the fall of 2022 and will affect the ability of various sports teams from practicing later in the day without lights. The school district plans to install the stadium lighting by the start of the 2022-2023 school year. In addition, the new field lighting will:

- Provide the capability to host sport events and games at the athletic stadium on the Carmel High School campus at night when students, parents, and community members can more easily attend;
- Avoid the need to bus student athletes to off-site locations and facilities for night time games at Monterey Peninsula College and to Carmel Middle School for practices and games; and
- Provide athlete and spectator safety by providing superior lighting conditions during sports events and games at night.
- Create a new, healthy weekend social opportunity for students while building school spirit through the ability to host nighttime games and events at Carmel High School stadium.

Environmental Noise Assessment

This environmental noise assessment has been prepared to determine if significant noise impacts would be produced by the project and to describe mitigation measures for noise if significant impacts are determined. The environmental noise assessment, prepared by WJV Acoustics, Inc. (WJVA), is based upon the project site plan (illumination summary) provided by the project applicant, project-related traffic data provided by Hexagon Transportation Consultants and a project site visit on April 20 and 21, 2021. Revisions to the site plan, project-related traffic data or other project-related information available to WJVA at the time the analysis was prepared may require a reevaluation of the findings and/or recommendations of the report.

Appendix A provides definitions of the acoustical terminology used in this report. Unless otherwise stated, all sound levels reported in this analysis are A-weighted sound pressure levels in decibels (dB). A-weighting de-emphasizes the very low and very high frequencies of sound in a manner similar to the human ear. Most community noise standards utilize A-weighted sound levels, as they correlate well with public reaction to noise. Appendix B provides typical A-weighted sound levels for common noise sources.

In terms of human perception, a 5 dB increase or decrease is considered to be a noticeable change in noise levels. Additionally, a 10 dB increase or decrease is perceived by the human ear as half as loud or twice as loud. In terms of perception, generally speaking the human ear cannot perceive an increase (or decrease) in noise levels less than 3 dB.

2. THRESHOLDS OF SIGNIFICANCE

The CEQA Guidelines apply the following questions for the assessment of significant noise impacts for a project:

- a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?
- c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

a. **Noise Level Standards**

Monterey County

The Safety Element of the Monterey County General Plan¹ (adopted October 26, 2010) establishes land use compatibility criteria in terms of the Community Noise Equivalent Level (CNEL) to describe noise exposure for noise compatibility planning purposes. The CNEL is the time-weighted energy average noise level for a 24-hour day, with a 5 dB (technically 4.77 dB) penalty added to noise levels occurring during the evening hours between 7:00 p.m. and 10:00 p.m. and a 10 dB penalty added to noise levels occurring during the nighttime hours between 10:00 p.m. and 7:00 a.m. The CNEL represents cumulative exposure to noise over an extended period of time and is therefore calculated based upon *annual average* conditions.

Although not explicitly stated in the General Plan, exterior noise level standards are typically applied to “outdoor activity areas”. Outdoor activity areas are generally considered to be backyards of single-family residential land uses, common use outdoor areas and individual patios and balconies of multi-family residential land uses, and common use outdoor areas for transient lodging land uses.

The “Noise Hazards” section of the Safety Element provides the following Goals and Policies that are relevant to the project:

Goal S-7: ***Maintain a healthy and quiet environment free from annoying and harmful sounds.***

Policy S-7.1: New Noise Sensitive land uses may only be allowed in areas where existing and projected noise levels are “acceptable” according to “Land Use Compatibility for

Community Noise Table” (Table I below).

- Policy S-7.2: Proposed development shall incorporate design elements necessary to minimize noise impacts on surrounding land uses and to reduce noise in indoor spaces to an acceptable level.
- Policy S-7.3: Development may occur in areas identified as “normally acceptable” provided effective measures to reduce both the indoor and outdoor noise levels to acceptable levels are taken.
- Policy S-7.4: New noise generators may be allowed in areas where projected noise levels are “conditionally acceptable” only after a detailed analysis of the noise reduction requirements is made and needed noise mitigation features are included in project design.
- Policy S-7.5: New noise generators shall be discouraged in areas identified as “normally unacceptable.” Where such new noise generators are permitted, mitigation to reduce both the indoor and outdoor noise levels will be required.
- Policy S-7.6: Acoustical Analysis shall be part of the environmental review process for projects when:
- a. Noise sensitive receptors are proposed in areas exposed to existing or projected noise levels that are “normally unacceptable” or higher according Table S-2 (“Land Use Compatibility for Community Noise”).
 - b. Proposed noise generators are likely to produce noise levels exceeding the levels shown in the adopted Community Noise Ordinance when received at existing or planned noise-sensitive receptors.
- Policy S-7.7: All proposed discretionary residential projects that are within roadway or railroad noise contours of 60 dB CNEL or greater shall include a finding of consistency with the provisions of the Noise Hazards section of the Safety Element. If found that the roadway noise exceeds 60 dB CNEL within the project site, a project-specific noise impact analysis shall be required. If impacts are identified, the applicant shall conduct mitigation analysis using published Caltrans/Federal Highway Administration guidelines and implement mitigation measures as required. Mitigation measures may include, but are not limited to sound walls, adjacent roadway design, dual pane glass, building location or design, etc. Any proposed mitigation measures shall be concurrently implemented with the implementation of the project.

Although not explicitly stated in the County’s General Plan, it is common to ensure interior noise levels attributable to exterior sources not exceed 45 dB CNEL (or L_{dn}) within residential land uses. This is consistent with Title 24 of the California Code of Regulations for residential construction and consistent with U.S. Department of Housing and Urban Development (HUD). The intent of

the interior noise level guideline is to provide an acceptable noise environment for indoor communication and sleep.

Additionally, Section 1207.4 of the California Building Code states *“Interior noise levels attributable to exterior sources should not exceed 45 dB in any inhabitable room. The noise metric shall be the day-night average sound level (L_{dn}) or the community noise equivalent level (CNEL), consistent with the noise level of the local general plan.”* The section of the California Building Code applies to Hotels and Motels.

TABLE I COMMUNITY NOISE EXPOSURE LEVELS (L_{dn}, or CNEL, dBA) MONTEREY COUNTY				
Land Use Category	Noise Ranges (L _{dn} or CNEL), dB			
	I	II	III	IV
Residential - Low-density Single-family, Duplex, Mobile Homes	<60	55-70	70-75	75+
Residential - Multifamily	<65	60-70	70-75	75+
Transient Lodging – Motels, Hotels	<65	60-70	70-80	80+
Schools, Libraries, Churches, Hospitals, Nursing Homes	<70	60-70	70-80	80+
Auditoriums, Concert Halls, Amphitheaters	--	<70	65+	--
Sports Arena, Outdoor Spectator Sports	--	<75	70+	--
Playgrounds, Neighborhood Parks	<70	70-75	75+	--
Golf Courses, Riding Stables, Water Recreation, Cemeteries	<75	70-80	--	80+
Office Buildings, Business Commercial, Professional	<70	65-75	75+	--
Industrial, Manufacturing, Utilities, Agriculture	<75	70-80	75-85	-

NOTES:

1. Noise Range I: Normally Acceptable. The specific land use is satisfactory based on the assumption that any buildings are of normal conventional construction.
2. Noise Range II: Conditionally Acceptable. New construction or development should be undertaken only after a detailed analysis of noise reduction is made and noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
3. Noise Range III: Normally Unacceptable. New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction must be made and noise insulation features must be included in the design.
4. Noise Range IV: Clearly Unacceptable. New construction or development should generally not be undertaken.

Source: County of Monterey 2010

The Monterey County Municipal Code² provides further exterior noise limits applicable to the project.

§10.60.030 – Operation of noise-producing devices restricted.

- At any time of the day, it is prohibited within unincorporated area of the County of Monterey to operate, assist in operating, allow, or cause to be operated any machine, mechanism, device or contrivance which produces a noise level exceeding eighty-five (85) dBA measured fifty (50) feet therefrom. The prohibition in this Section shall not apply to

aircraft nor to any such machine, mechanism, device or contrivance that is operated in excess of two thousand five hundred (2,500) feet from any occupied dwelling unit.

§10.60.040 – Regulation of nighttime noise.

The following regulations shall apply to nighttime noise:

- a. It is prohibited within the unincorporated area of the County of Monterey to make, assist in making, allow, continue, create, or cause to be made any loud and unreasonable sound any day of the week from 10:00 p.m. to 7:00 a.m. the following morning.
- b. Within the period of 10:00 p.m. to 7:00 a.m. the following morning, and for the purposes of this Section, a loud and unreasonable sound shall include any sound that exceeds the exterior noise levels standards set forth in Table II below.

(Nighttime Only)

Table II	Standard
Nighttime hourly equivalent sound level (L_{eq} dBA)	45
Maximum (L_{max}) level, dBA	65

State of California

There are no state noise standards that are applicable to the project.

Federal Noise Standards

There are no federal noise standards that are applicable to the project.

b. Construction Noise and Vibration

The “Noise Hazards” section of the Safety Element of the Monterey County General Plan provides the following Policies pertaining to construction noise and vibration:

Policy S-7.8: All discretionary projects that propose the use of heavy construction equipment that has the potential to create vibrations that could cause structural damage to adjacent structures within 100 feet shall be required to submit a pre-construction vibration study prior to the approval of a building permit. Projects shall be required to incorporate specified measures and monitoring identified to reduce impacts. Pile driving or blasting are illustrative of the type of equipment that could subject to this policy.

Policy S-7.9: No construction activities pursuant to a County permit that exceed “acceptable” levels listed in Policy S-7.1 shall be allowed within 500 feet of a noise sensitive land use during the evening hours of Monday through Saturday, or anytime on Sunday or holidays, prior to completion of a noise mitigation study. Noise protection measures, in the event of any identified impact, may include but not be limited to:

- Constructing temporary barriers, or
- Using quieter equipment than normal.

Policy S-7.10: Construction projects shall include the following standard noise protection measures:

- Construction shall occur only during times allowed by ordinance/code unless such limits are waived for public convenience;
- All equipment shall have properly operating mufflers; and
- Lay-down yards and semi-stationary equipment such as pumps or generators shall be located as far from noise-sensitive land uses as practical.

Neither the General Plan nor the County’s Code of Ordinances provide specific prohibited hours of construction activities, however, it is typical to limit construction to the hours of (at a minimum) 7:00 a.m. to 7:00 p.m.

There are no Monterey County Vibration level standards. Some guidance is provided by the Caltrans Transportation and Construction Vibration Guidance Manual³. The Manual provides guidance for determining annoyance potential criteria and damage potential threshold criteria. These criteria are provided below in Table III and Table IV, and are presented in terms of peak particle velocity (PPV) in inches per second (in/sec).

TABLE III		
GUIDELINE VIBRATION ANNOYANCE POTENTIAL CRITERIA		
Human Response	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely Perceptible	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strongly Perceptible	0.9	0.1
Severe	2.0	0.4

Source: Caltrans

TABLE IV		
GUIDELINE VIBRATION DAMAGE POTENTIAL THRESHOLD CRITERIA		
Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile, historic buildings, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: Caltrans

3. SETTING

The project site is located in unincorporated Monterey County within the rural/suburban State Route 1 corridor running south to north between the Carmel River and the Big Sur coast to the south, the City of Carmel-by-the-Sea to the west, and the Del Monte Forest area and City of Monterey to the north. Hatton Canyon and residential neighborhoods sit to the immediate east of the campus while the greater Carmel Valley area sits further to the east.

The approximately 3.8-acre project site is the existing athletic stadium located on the south edge of the Carmel High School (high school) campus. The campus is located immediately east of State Route 1 and approximately 0.50 miles east of the City of Carmel-by-the-Sea in unincorporated Monterey County.

The stadium site is entirely flat and is placed on the lowest graded terrace of a series of north to south terraces that make up the larger high school campus. The south portion of the high school campus is largely made up of the high school's sports facilities, including a swimming facility, football/track and field stadium, tennis courts, and baseball diamond. The stadium site is entirely flat and is placed on the lowest graded terrace of a series of north to south terraces that make up the larger high school campus.

a. Background Noise Level Measurements

Existing ambient noise levels in the project vicinity are dominated by traffic noise along State Route 1 (SR-1) and other local roadways. Additional sources of noise observed during site inspection included aircraft overflights, landscaping equipment, barking dogs and birds.

Measurements of existing ambient noise levels in the project vicinity were conducted on April 20 and April 21, 2021. Long-term (24-hour) ambient noise level measurements were conducted at two (2) locations (sites LT-1 and LT-2). One long-term ambient noise measurement site was located in the vicinity of existing residential land uses east of the stadium, along Flanders Drive (LT-1), and was exposed to traffic noise associated localized traffic and other noise sources typical of residential neighborhoods.

A second long-term ambient noise monitoring site (LT-2) was located near residential land uses along Morse Drive. The meter was placed at the rear of the residential land uses, facing the stadium. Noise monitoring site LT-2 was exposed traffic noise associated with SR-1 as well as localized traffic, activities occurring at the high school baseball field and the adjacent parking lot.

Additionally, short-term (15-minute) ambient noise level measurements were conducted at four (4) locations (Sites ST-1 through ST-4). The project vicinity and locations of the noise monitoring sites are shown on Figure 2. Two (2) individual measurements were taken at each of the four short-term sites to quantify ambient noise levels in the morning and afternoon hours.

Noise monitoring equipment consisted of Larson-Davis Laboratories Model LDL-820 sound level analyzers equipped with B&K Type 4176 1/2" microphones. The equipment complies with the specifications of the American National Standards Institute (ANSI) for Type I (Precision) sound level meters. The meters were calibrated with a B&K Type 4230 acoustic calibrator to ensure the accuracy of the measurements.

Measured hourly energy average noise levels (L_{eq}) at site LT-1 ranged from a low of 29.9 dB between midnight and 1:00 a.m. to a high of 53.8 dB between 4:00 p.m. and 5:00 p.m. Hourly maximum (L_{max}) noise levels at site LT-1 ranged from 34.9 to 74.4 dB. Residual noise levels at the monitoring site, as defined by the L_{90} statistical descriptor ranged from 28.5 to 37.7 dB. The L_{90} is a statistical descriptor that defines the noise level exceeded 90% of the time during each hour of the sample period. The L_{90} is generally considered to represent the residual (or background) noise level in the absence of identifiable single noise events from traffic, aircraft and other local noise sources. The measured CNEL value at site LT-1 during the 24-hour noise measurement period was 51.2 dB. Figure 3 graphically depicts hourly variations in ambient noise levels at the LT-1 long-term monitoring site as well as a site photograph.

Measured hourly energy average noise levels (L_{eq}) at site LT-2 ranged from a low of 35.5 dB between 1:00 a.m. and 2:00 a.m. to a high of 65.5 dBA between 10:00 a.m. and 11:00 a.m. Hourly maximum (L_{max}) noise levels at site LT-2 ranged from 47.3 to 81.1 dB. Residual noise levels at the monitoring site, as defined by the L_{90} , ranged from 31.1 to 41.6 dB. The measured CNEL value at site LT-2 during the 24-hour noise measurement period was 54.0 dB. Figure 4 graphically depicts hourly variations in ambient noise levels at the LT-2 long-term monitoring site as well as a site photograph.

The short-term site noise measurement data included energy average (L_{eq}) maximum (L_{max}) as well as five (5) individual statistical parameters. Observations were made of the dominant noise sources affecting the measurements. The statistical parameters describe the percent of time a noise level was exceeded during the measurement period. Table V summarizes short-term noise measurement results.

TABLE V
SUMMARY OF SHORT-TERM NOISE MEASUREMENT DATA
CARMEL HIGH SCHOOL STADIUM LIGHTS
MONTEREY COUNTY
APRIL 20 & 21, 2020

Site	Time	A-Weighted Decibels, dBA							Sources
		L _{eq}	L _{max}	L ₂	L ₈	L ₂₅	L ₅₀	L ₉₀	
ST-1	8:05 a.m.	63.4	81.1	71.2	66.4	61.7	58.2	55.0	TR, L, B
ST-1	3:35 p.m.	61.9	77.4	70.7	65.9	60.3	56.1	54.1	TR, AC
ST-2	8:25 a.m.	61.8	75.9	69.4	63.7	62.0	56.6	51.7	TR, AC, L
ST-2	4:00 p.m.	62.4	80.0	69.2	64.1	61.8	55.5	52.0	TR, D
ST-3	8:50 a.m.	53.7	68.8	62.1	54.9	44.2	38.1	36.2	TR, B, AC
ST-3	4:25 p.m.	55.0	72.9	63.5	53.1	47.4	38.4	37.6	TR, D
ST-4	9:15 a.m.	56.1	75.4	66.2	57.1	50.3	41.1	39.7	TR, L, AC
ST-4	4:50 p.m.	57.4	79.5	67.1	60.3	52.3	53.9	41.1	TR, AC

TR: Traffic AC: Aircraft V: Voices D: Dogs Barking B: Birds R: Landscaping Activities: L
Source: WJV Acoustics, Inc.

Short-term noise measurements were conducted for 15-minute periods. Sites ST-1 and ST-2 were located west of SR-1, and were exposed to traffic noise from SR-1 and local roadways. Sites ST-3 and ST-4 were located east of SR-1, in neighborhood areas in the general vicinity of the high school. Sites SR-3 and SR-4 were exposed to noise typical of residential land uses, including traffic on local roadways and residential human activities.

4. PROJECT IMPACTS

a. Project Traffic Noise Impacts on Existing Noise-Sensitive Land Uses (Less Than Significant)

WJVA consulted with Hexagon Traffic Consultants, the project traffic engineer, regarding project-related traffic. The following is a description of project-related traffic, provided by Hexagon Traffic Consultants, regarding existing stadium-related traffic and anticipated increases in stadium attendance and subsequent associated traffic.

The proposed stadium lighting project is expected to result in an increase in attendance for the football games and other sporting events. The increase in attendees will result in an increase in vehicular trips that is currently generated by the events. Currently, football games with up to 500 attendees are played during afternoon hours, or off-site at Monterey Peninsula College or Pacific Grove High School for postseason games. The project would increase the attendance of football games on Friday nights from the current approximately 500 attendees to up to 800 attendees. The football season typically runs for seven (7) weeks between September and November with approximately four (4) to six (6) home games hosted by Carmel High School.

Due to pandemic conditions, there were no scheduled high school football games in the surrounding region for which observations of carpooling activity could be collected. Therefore, this analysis utilizes a vehicle occupancy rate based on data previously collected for a homecoming football game on a Friday night at Mitty High School in San Jose, California. Hexagon counted the number of vehicles parked at Mitty High School, at an adjacent church, and on the surrounding streets during the homecoming game on Friday, October 5, 2018 and on a regular Friday night on October 26, 2018. The difference between the two parking counts represents Mitty game night traffic. Based on the number of additional parked vehicles and the estimated attendance at the surveyed Friday night game, the vehicle occupancy rate was calculated to be an average of 3.24 persons per vehicle for the game attendees.

Utilizing the surveyed vehicle occupancy rate and anticipated attendance projections, the average trip increase per day for Friday night football games at Carmel High School would be approximately 37 trips (300 attendees / 3.24 persons per vehicle x 2 trips (inbound and outbound) x 1 event per week / 5 days per week = 37 trips per day). During a homecoming or rivalry game, attendance is expected to increase from the current 1,500 attendees to an anticipated 2,000 attendees. Therefore, the worst-case average trip increase during the football season would be approximately 62 trips per day.

The stadium lighting also would increase the attendance for other sporting events, such as soccer in winter and lacrosse in the spring, from the current approximately 200 attendees to up to 500 attendees. The total vehicular trips of non-football events would be lower than those of evening football games since the total attendance for non-football sports events will be less than Friday night football games. Moreover, fall sports (football), winter sports (soccer), and spring sports (lacrosse/track & field) would not occur concurrently. Therefore, the evaluation of Friday evening football games represents a worst-case scenario in terms of total trips throughout the year.

The overall distribution of the 62 daily increased trips over local roadways was not analyzed as part of the traffic study. However, WJVA ran some basic calculations to determine noise levels that could be associated with an increase of 62 daily trips. WJVA modeled the increased daily traffic trips to provide a generalized understanding of overall increases in traffic noise associated with the project.

WJVA utilized the FHWA Traffic Noise Model⁴ to quantify generalized increases in traffic noise. The FHWA Model is a standard analytical method used for roadway traffic noise calculations. The model is based upon reference energy emission levels for automobiles, medium trucks (2 axles) and heavy trucks (3 or more axles), with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and the acoustical characteristics of the site. The FHWA Model was developed to predict hourly L_{eq} values for free-flowing traffic conditions, and is generally considered to be accurate within ± 1.5 dB. To predict CNEL values, it is necessary to determine the hourly distribution of traffic for a typical day and adjust the traffic volume input data to yield an equivalent hourly traffic volume.

As stated above, the distribution of the 62 increased daily trips over the local roadways was not provided as part of the traffic study. For a generalized (and worst-case analysis), WJVA modeled anticipated noise levels that would occur if all 62 trips were along one single roadway. Assuming a vehicle speed of 35 miles per hour (mph) and a generalized setback distance of 100 feet from the roadway, noise levels associated with 62 vehicle trips on a single roadway would result in traffic noise exposure of approximately 33 dB CNEL.

If this noise exposure level of 33 dB CNEL, associated with the 62 daily project-related trips, was applied (added) to the two 24-hour noise measurements sites described above (LT-1 and LT-2), the project-related traffic noise would not result in any increase in overall noise exposure, as defined by the Community Noise Equivalent Level (CNEL). Decibels are logarithmic in nature and cannot be added arithmetically. For example, the measured 24-hour noise level exposure at sites LT-1 and LT-2 was 51 dB CNEL and 54 dB CNEL, respectively. Assuming a worst-case scenario that all 62 daily trips were to be applied to either Morse Drive or Flanders Drive, the resulting noise exposures at the two sites would remain 51 dB CNEL and 54 dB CNEL, respectively ($51 \text{ dB} + 33 \text{ dB} = 51 \text{ dB}$, and $54 \text{ dB} + 33 \text{ dB} = 54 \text{ dB}$). Therefore, project-related increases in traffic noise would not result in any overall increase in noise exposure throughout the project area, even when the entirety of daily trips are applied to one single roadway/area.

b. Noise Impacts from Stadium Events (Less Than Significant)

The noise levels associated with activities such as high school football games, other sporting events and other events held in the stadium cannot be precisely defined due to variables such as the number of attendees, atmospheric conditions and the topographical relationship between the stadium and off-site sensitive receptors. Additionally, as described above, due to pandemic conditions there were no high school football games held at the stadium or within the surrounding area last year. WJVA therefore reviewed noise level data previously collected for a different project, these noise levels are described below.

Football Games (and other stadium events): Noise due football games and other events held within the stadium would be extremely variable based upon such factors as the size of the crowd, volume of the public address system, and time of the day. As such quantifying and describing such noise levels can be problematic.

In order to assess potential football game noise levels, WJVA staff conducted reference noise level measurements at Mineral King Bowl in Visalia, California on November 9, 2018 during a high school football game. It should be noted; the game was a sectional playoff game and crowd size and volume was likely louder than a “typical” game. Additionally, crowd size and PA system may not be comparable to that which would be expected at Carmel High School. The exact attendance at the football game was not determined, however, the Mineral King Bowl has a capacity of up to 8,500 during football games.

During the football game WJVA collected numerous 15-minute noise level samples. Noise level measurements were taken at a distance of approximately 200 feet from the center of the playing field. Figure 5 provides a graphic showing the reference noise measurement site at The Mineral King Bowl in Visalia.

At the above-described reference noise measurement site, average noise levels during the football game were approximately 60-66 dB L_{eq} with maximum (L_{max}) noise levels ranging between approximately 70-75 dB. The closest residential land uses to the football stadium are located at distance of 350 feet or greater to the south, 500 feet or greater to the west and 650 feet or greater to the east. Applying the noise levels measured at the Visalia stadium location, such levels would be in the range of approximately 50-60 dB L_{eq} and 60-70 dB L_{max} , at the closest residential land uses. The noise levels measured above are likely significantly higher than those which would occur at Carmel High School due to crowd size of the event and overall stadium size and design. Additionally, the Carmel High School stadium is located at an elevation that is generally approximately 30 to 60 feet above the elevation of the residential land uses to the south and the east, providing topographic acoustic shielding from some of the noise sources, and noise levels associated with vehicle traffic on SR-1 would generally be higher at the homes to the west than noise levels associated with football game activities.

According to the school district, high school football games would typically take place between the hours of 5:00 p.m. to 9:30 p.m. Existing maximum noise levels measured at noise monitoring site LT-1 were in the range of approximately 66-74 dB between the hours of 5:00 p.m. and 10:00 p.m., and existing maximum noise levels measured at noise monitoring site LT-2 were in the

range of approximately 61 to 75 dB between the hours of 5:00 p.m. and 10:00 p.m. Maximum noise levels measured at the short-term noise monitoring sites ranged from 68 to 81 dB. The worst-case assessment of football game maximum noise levels at nearby residential land uses is between approximately 60 to 70 dB. Such maximum noise levels do not exceed the existing maximum noise levels measured at the noise measurement sites. It should also be noted, Monterey County does not have applicable daytime noise level standards, and only provides nighttime (10:00 p.m. to 7:00 a.m.) noise standards (provided above as Table II).

c. Noise From Construction (Less Than Significant)

Project construction would occur over a period of two months starting in June 2022. Construction activities would include materials delivery, excavation for pole foundation installation, installation via hydraulic crane of the lighting poles, mounting of the luminaires, and restoration of disturbed surfaces including pavement and landscaping that was removed during excavation and trenching.

Typical construction equipment would be used, such as an excavator, boring machine, concrete truck and pump, and a crane for pole installation and field lighting mounting, as well as semi-trucks for materials delivery. Construction would likely occur during daylight hours during a school break. Construction crews would primarily access the site via the access road (accessible only to school district personnel) which runs from Ocean Avenue to the north around the eastside of campus south to the stadium site. Access gates to the site would be locked outside of construction hours. Construction vehicles, equipment, and materials would be stored on the project site or adjacent facility storage buildings or the campus access road.

Construction noise is typically not considered to be a significant impact if construction is limited to the daytime hours and construction equipment is adequately maintained and muffled. Extraordinary noise-producing activities (e.g., pile driving) are not anticipated. In this case, all project construction activity must be confined to daytime hours, as the Monterey County Noise Element of the General Plan prohibits construction activity in the evening/nighttime hours as well as Sundays on Holidays. Neither the General Plan nor the County's Code of Ordinances provide specific prohibited hours of construction activities, however, it is typical to limit construction activities to the hours of (at a minimum) 7:00 a.m. to 7:00 p.m. Construction noise impacts could result in annoyance or sleep disruption for nearby residents if nighttime operations were to occur or if equipment is not properly muffled or maintained. For the purpose of providing generalized reference noise levels for typical construction activities, Table VI provides typical construction-related noise levels at distances of 100 feet, 200 feet, and 300 feet.

TABLE VI
TYPICAL CONSTRUCTION EQUIPMENT
MAXIMUM NOISE LEVELS, dBA

Type of Equipment	100 Ft.	200 Ft.	300 Ft.
Concrete Saw	84	78	74
Crane	75	69	65
Excavator	75	69	65
Front End Loader	73	67	63
Jackhammer	83	77	73
Paver	71	65	61
Pneumatic Tools	79	73	69
Dozer	76	70	66
Rollers	74	68	64
Trucks	80	72	70
Pumps	74	68	64
Scrapers	81	75	71
Portable Generators	74	68	64
Backhoe	80	74	70
Grader	80	74	70

Source: FHWA

Noise Control for Buildings and Manufacturing Plants, Bolt, Beranek & Newman, 1987

d. Vibration Impacts (Less Than Significant)

The dominant sources of man-made vibration are sonic booms, blasting, pile driving, pavement breaking, demolition, diesel locomotives, and rail-car coupling. None of these activities are anticipated to occur with construction or operation of the proposed project. Typical vibration levels at distances of 100 feet and 300 feet are summarized by Table VII. These levels do would not be expected to exceed any significant threshold levels for annoyance or damage, as provided above in Table III and Table IV.

TABLE VII
TYPICAL VIBRATION LEVELS DURING CONSTRUCTION

Equipment	PPV (in/sec)	
	@ 100'	@ 300'
Bulldozer (Large)	0.011	0.006
Bulldozer (Small)	0.0004	0.00019
Loaded Truck	0.01	0.005
Jackhammer	0.005	0.002
Vibratory Roller	.03	0.013
Caisson Drilling	.01	0.006

Source: *Caltrans*

e. Noise Impacts from Nearby Airports or Airstrips (No Impact)

The Project site is not located within two miles of a public airport or private airstrip. The Monterey Regional Airport is located approximately four miles northeast of the project site.

5. IMPACT SUMMARY

The project would not be expected to result in any significant noise impacts at nearby noise-sensitive receptors. Project-related increases in traffic noise exposure would not result in any increase over existing ambient noise levels. Additionally, noise levels associated with stadium events (football games) would not be expected to result in noise levels exceeding any Monterey County noise level standards or existing (without project) ambient noise levels at nearby noise-sensitive land uses. Mitigation measures are therefore not required for project compliance.

6. SOURCES CONSULTED

1. Monterey County General Plan, October 2010.
2. Monterey County Code of Ordinances, *Health and Safety*.
3. California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, September 2013.
4. Federal Highway Administration, *Traffic Noise Model, Version 2.5*, April 14, 2004

FIGURE 1: PROJECT SITE PLAN (ILLUMINATION SUMMARY)



FIGURE 2: PROJECT VICINITY AND AMBIENT NOISE MONITORING SITES



FIGURE 3: HOURLY NOISE LEVELS AT LONG-TERM MONITORING SITE LT-1

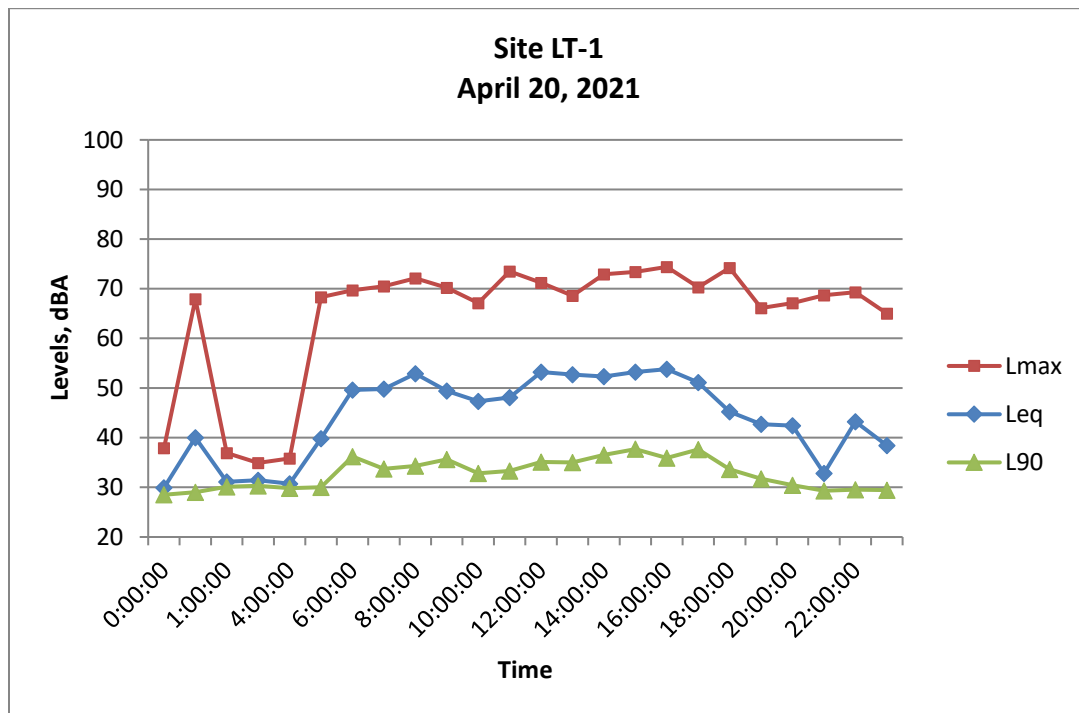


FIGURE 4: HOURLY NOISE LEVELS AT LONG-TERM MONITORING SITE LT-2

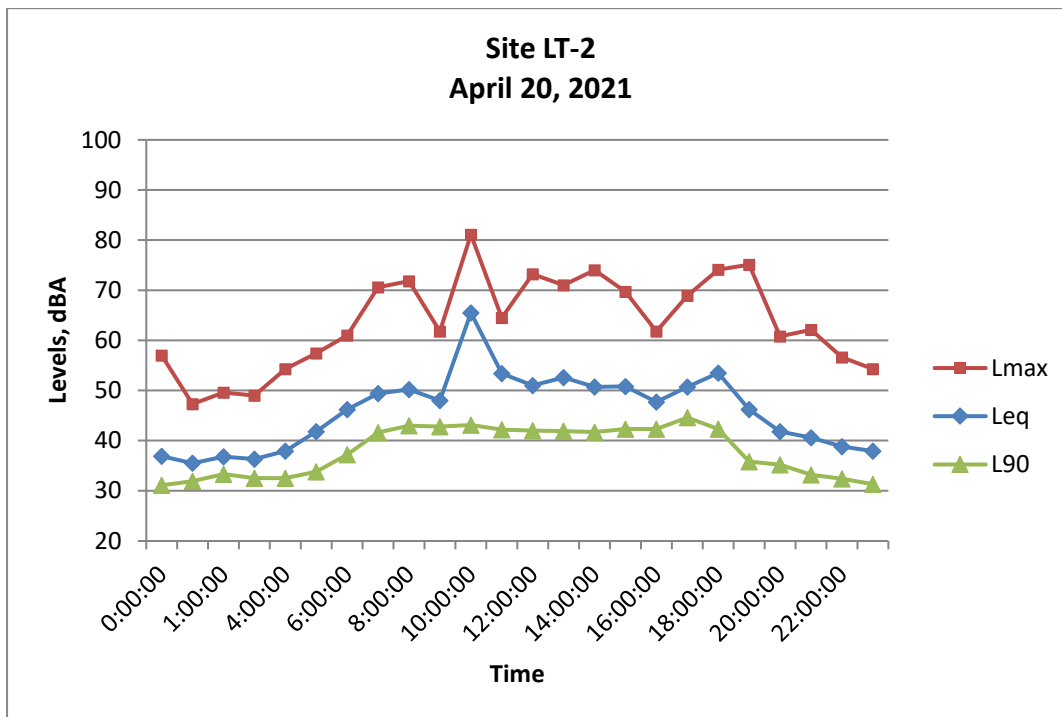


FIGURE 5: LOCATION OF REFENCE NOISE MEASUREMENT SITE AT MINERAL KING BOWL, VISALIA



APPENDIX A-1

ACOUSTICAL TERMINOLOGY

AMBIENT NOISE LEVEL:	The composite of noise from all sources near and far. In this context, the ambient noise level constitutes the normal or existing level of environmental noise at a given location.
CNEL:	Community Noise Equivalent Level. The average equivalent sound level during a 24-hour day, obtained after addition of approximately five decibels to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and ten decibels to sound levels in the night before 7:00 a.m. and after 10:00 p.m.
DECIBEL, dB:	A unit for describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micropascals (20 micronewtons per square meter).
DNL/L_{dn}:	Day/Night Average Sound Level. The average equivalent sound level during a 24-hour day, obtained after addition of ten decibels to sound levels in the night after 10:00 p.m. and before 7:00 a.m.
L_{eq}:	Equivalent Sound Level. The sound level containing the same total energy as a time varying signal over a given sample period. L_{eq} is typically computed over 1, 8 and 24-hour sample periods.
NOTE:	The CNEL and DNL represent daily levels of noise exposure averaged on an annual basis, while L_{eq} represents the average noise exposure for a shorter time period, typically one hour.
L_{max}:	The maximum noise level recorded during a noise event.
L_n:	The sound level exceeded "n" percent of the time during a sample interval (L_{90} , L_{50} , L_{10} , etc.). For example, L_{10} equals the level exceeded 10 percent of the time.

A-2

ACOUSTICAL TERMINOLOGY

NOISE EXPOSURE CONTOURS:

Lines drawn about a noise source indicating constant levels of noise exposure. CNEL and DNL contours are frequently utilized to describe community exposure to noise.

NOISE LEVEL REDUCTION (NLR):

The noise reduction between indoor and outdoor environments or between two rooms that is the numerical difference, in decibels, of the average sound pressure levels in those areas or rooms. A measurement of “noise level reduction” combines the effect of the transmission loss performance of the structure plus the effect of acoustic absorption present in the receiving room.

SEL or SENEL:

Sound Exposure Level or Single Event Noise Exposure Level. The level of noise accumulated during a single noise event, such as an aircraft overflight, with reference to a duration of one second. More specifically, it is the time-integrated A-weighted squared sound pressure for a stated time interval or event, based on a reference pressure of 20 micropascals and a reference duration of one second.

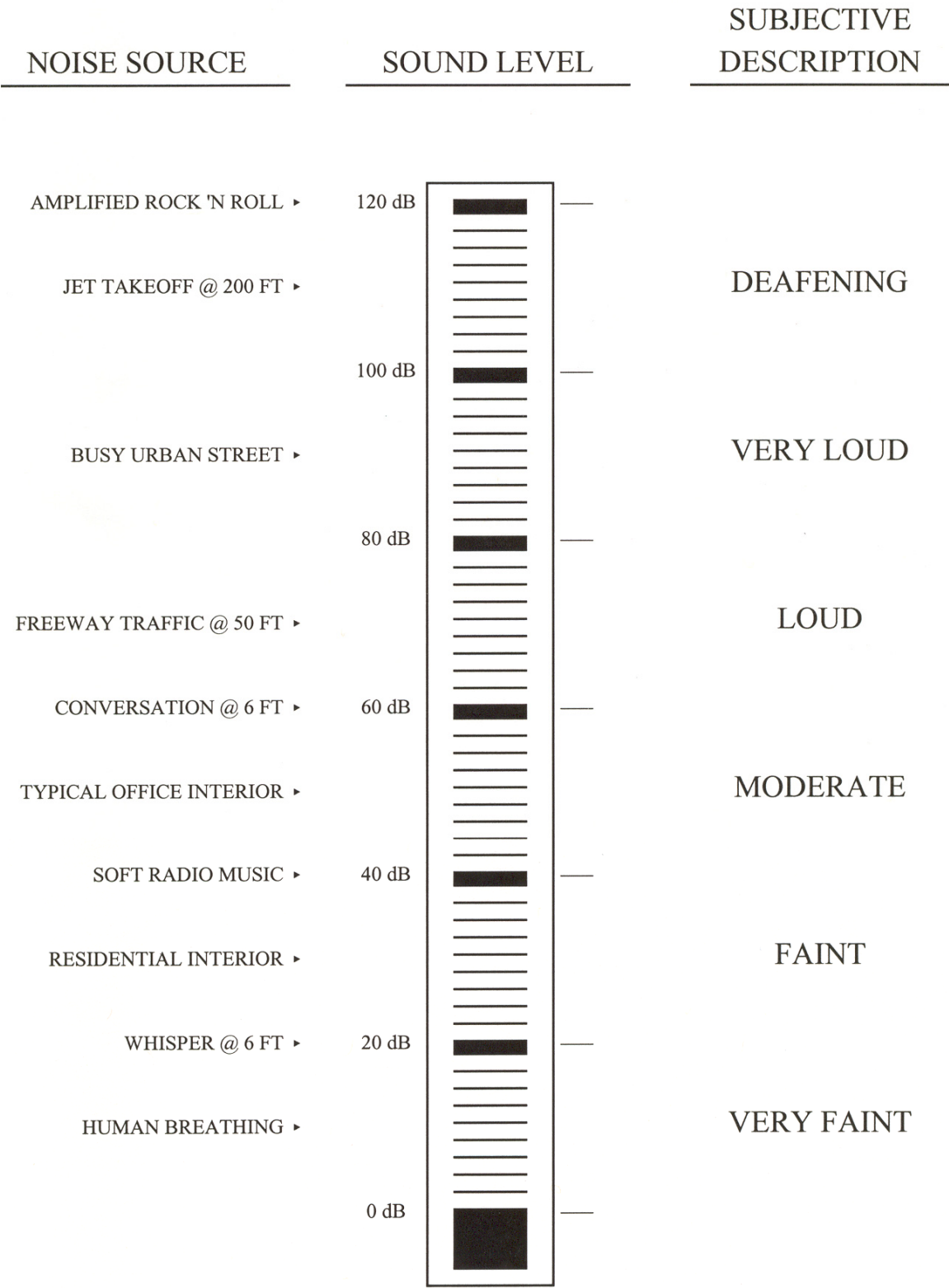
SOUND LEVEL:

The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the response of the human ear and gives good correlation with subjective reactions to noise.

SOUND TRANSMISSION CLASS (STC):

The single-number rating of sound transmission loss for a construction element (window, door, etc.) over a frequency range where speech intelligibility largely occurs.

APPENDIX B
EXAMPLES OF SOUND LEVELS



APPENDIX F

VMT ASSESSMENT, PREPARED BY HEXAGON TRANSPORTATION
CONSULTANTS (DATED JULY 1, 2021)



HEXAGON TRANSPORTATION CONSULTANTS, INC.

Memorandum

Date: July 1, 2021
To: Stuart Poulter, EMC Planning Group
From: Robert Del Rio, T.E., Luis Descanzo
Subject: VMT Assessment for the Proposed Carmel High School Stadium Lighting in Carmel-by-the-Sea, California

Hexagon Transportation Consultants, Inc. has completed a vehicle-miles traveled (VMT) assessment and operations evaluation for the proposed installation of stadium lights at the Carmel High School field. Carmel High School (CHS) is located at 3600 Ocean Avenue in unincorporated Monterey County. The location of the CHS stadium and the surrounding study area are shown on Figure 1.

Project Description

The project proposes to add lights to the existing football stadium on campus. There are no proposed changes to existing site access driveways or parking facilities and no additional stadium seating would be provided. The school district plans to install the stadium lighting by the start of the 2022-2023 school year. The new field lighting will:

- Provide for the capability to host sport events and games at the athletic stadium on the Carmel High School campus at night when students, parents, and community members can more easily attend;
- Avoid the need to bus student athletes to off-site locations and facilities for nighttime games at Monterey Peninsula College and to Carmel Middle School for practices and games; and
- Provide athlete and spectator safety by providing superior lighting conditions during sports events and games at night.
- Create a new, healthy weekend social opportunity for students while building school spirit through the ability to host nighttime games and events at Carmel High School stadium.

The stadium lights would allow the school to provide flexible nighttime use of the field for various sporting and school events. However, the addition of stadium lights is primarily intended to allow for Friday night football games and other nighttime games and practices in anticipation of the state's "late start law," which will go into effect starting in the Fall of 2022. Table 1 provides a summary of the anticipated use of the stadium with the proposed lighting. As shown in the table, use of lighting during and following athletic practices would generally end by 7:00 PM. Most athletic games would end by 7:00 PM, but no later than 9:30 PM (for example, Friday evening football games), with lighting potentially remaining on after to facilitate safe crowd exiting and for clean-up and other similar activities after game completion. It should be noted that the number of participants shown in the table does not include attendance of spectators.

Currently, football games with up to 500 attendees are played during afternoon hours, or off-site at Monterey Peninsula College or Pacific Grove High School for postseason games. With the stadium

Figure 1
Site Location

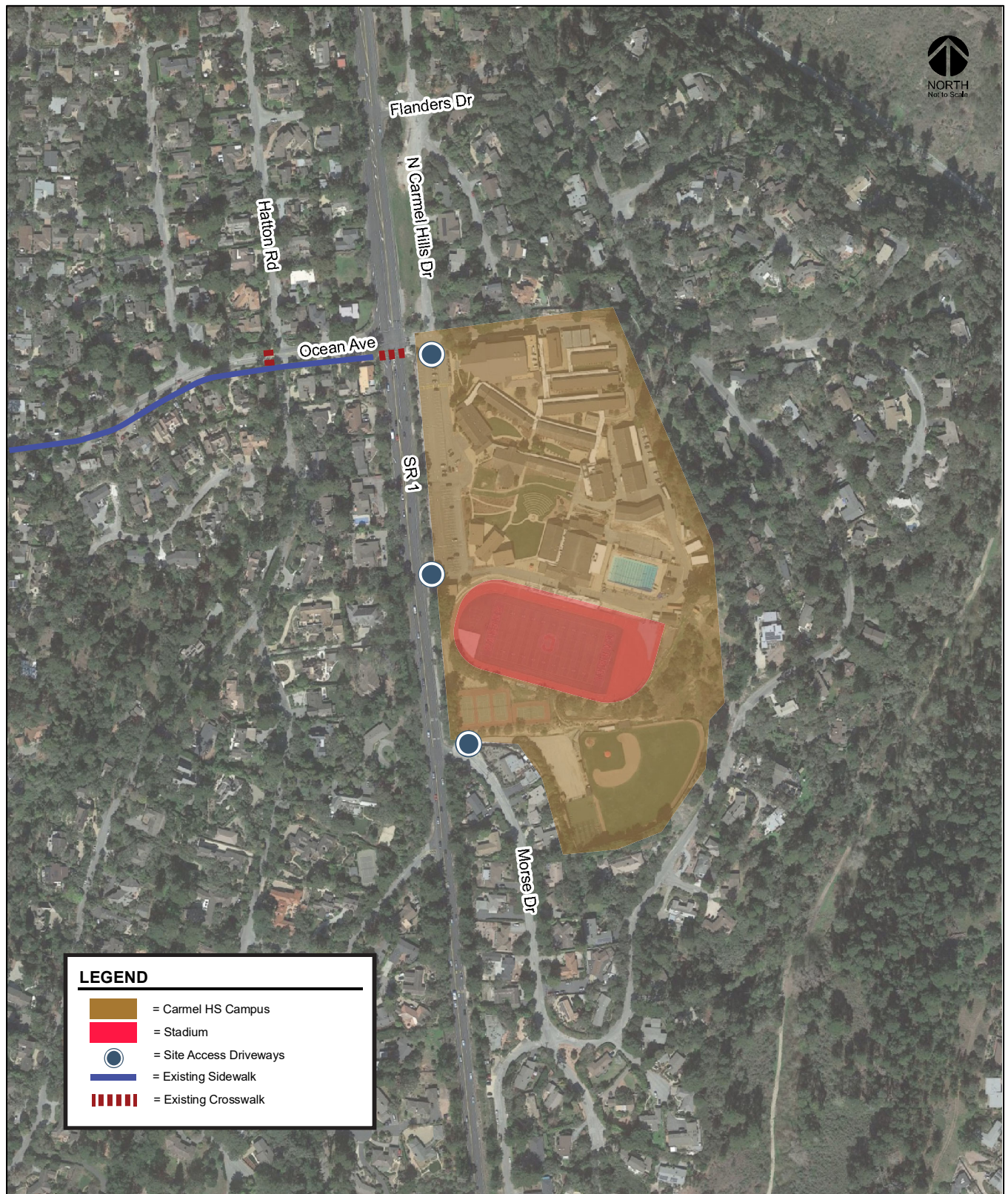


Table 1
Proposed Schedule of Stadium Uses (After Installation of Field Lights)

Sports Team	Days of the Week	Timing		Number of Participants	Number of Evening Games per Year
		Start	End		
Fall Sports (August to November)					
Field Hockey (Girls)					
Practices	Monday - Friday	4:00 PM or 5:30 PM	5:30 PM or 7:00 PM	30-50	
Games	Monday - Friday (Varies)	4:00 PM	6:00 PM	60-70	6-8
Football (Boys)					
Practices	Monday - Thursday	4:00 PM	5:30 PM	60-80	
Games	Thursday/Friday/Saturday	5:00 PM	9:30 PM	120-160	4-6
Winter Sports (November to February)					
Soccer (Boys & Girls)					
Practices	Monday - Friday	4:00 PM	7:00 PM	30-60	
Games	Monday - Friday (Varies)	5:00 PM	7:00 PM	80-90	10-15
Spring Sports (February to May)					
Lacrosse (Boys & Girls)					
Practices	Monday - Friday	4:00 PM	7:00 PM	60-80	
Games	Monday - Friday (Varies)	5:00 PM	7:00 PM	120-200	10
Track & Field (Boys & Girls)					
Practices	Monday - Friday	4:00 PM	5:30 PM	60-80	
Meets	Wednesday or Thursday	4:00 PM	7:00 PM	120-200	2-4
Source: CUSD					

lights, the number of attendees is expected to increase from 500 to 800 for most football games. Factors such as team record, opponent and conflicting events are expected to affect attendance. Attendance at all other sports games (soccer, lacrosse, and field hockey) is expected to be lower than that of football games. Because the new Friday evening football games on campus are expected to generate the greatest number of attendees and associated vehicle trips, the transportation study focuses on the potential impacts resulting from the Friday evening football games with an anticipated 800 attendees. All other field uses are expected to have lesser impacts since the total attendance at non-football events will be much less than Friday night football games.

The purpose of this memorandum is to provide an assessment of the project's effect on VMT. The VMT assessment methodology and results are discussed below. The methodology, results, and recommendations of the site access and parking evaluation also are discussed below.

VMT Assessment Methodology and Results

Pursuant to Senate Bill (SB) 743, the California Environmental Quality Act (CEQA) 2019 Update Guidelines Section 15064.3, subdivision (b) states that VMT will be the metric in analyzing transportation impacts for CEQA purposes. VMT is the total miles of travel by personal motorized vehicles a project is expected to generate in a day. VMT measures the full distance of personal motorized vehicle-trips with one end within the project. Typically, development projects that are farther from other, complementary land uses (such as a business park far from housing) and in areas without transit or active transportation infrastructure (bike lanes, sidewalks, etc.) generate more driving than development near complementary land uses with more robust transportation options. Therefore, developments located in a central business district with high density and diversity of complementary land uses and frequent transit services are expected to internalize trips and generate shorter and fewer vehicle trips than developments located in a suburban area with low density of residential developments and no transit serve in the project vicinity.

The County of Monterey and the Transportation Agency for Monterey County (TAMC), at the time of this report, have not yet adopted any analysis procedures, standards, or guidelines consistent with SB 743. In the absence of an adopted, or even draft, policy with numeric thresholds, this assessment relies on guidelines published by the Governor's Office of Planning and Research (OPR) in analyzing the project's effects on VMT.

Daily Trip Generation Estimates

The proposed stadium lighting is expected to result in an increase in attendance for football games and other sporting events. The increase in attendees will result in an increase in vehicular trips and VMT that is currently generated by the sporting events. Currently, football games with up to 500 attendees are played during afternoon hours, or off-site at Monterey Peninsula College or Pacific Grove High School for postseason games. The project would increase the attendance of football games on Friday nights from the current approximately 500 attendees to up to 800 attendees. The football season typically runs for 7 weeks between September and November with approximately 4 to 6 home games hosted by CHS.

Due to pandemic conditions, there were no scheduled high school football games in the surrounding region for which observations of carpooling activity could be collected. Therefore, this analysis utilizes a vehicle occupancy rate based on data previously collected for a homecoming football game on a Friday night at Mitty High School in San Jose, California. Hexagon counted the number of vehicles parked at Mitty High School, at an adjacent church, and on the surrounding streets during the homecoming game on Friday, October 5, 2018, and on a regular Friday night on October 26, 2018. The difference between the two parking counts represents Mitty game night traffic. Based on the number of additional parked vehicles and the estimated attendance at the surveyed Friday night game, the vehicle occupancy rate was calculated to be an average of 3.24 persons per vehicle for the game attendees.

Utilizing the surveyed vehicle occupancy rate and anticipated attendance projections, the average trip increase per day for Friday night football games at Carmel High School would be approximately 37 trips (300 attendees / 3.24 persons per vehicle x 2 trips (inbound and outbound) x 1 event per week / 5 days per week = 37 trips per day). During a homecoming or rivalry game, attendance is expected to increase from the current 1,500 attendees to an anticipated 2,000 attendees. Therefore, the worst-case average trip increase during the football season would be approximately 62 trips per day for the homecoming and rivalry games.

The stadium lighting also would increase the attendance for other sporting events, such as soccer in winter and lacrosse in the spring, from the current approximately 200 attendees to up to 500 attendees.

The total vehicular trips and resulting VMT of non-football events would be lower than those of evening football games since the total attendance for non-football sports events will be less than Friday night football games. Moreover, fall sports (football), winter sports (soccer), and spring sports (lacrosse/track & field) would not occur concurrently. Therefore, the evaluation of Friday evening football games represents a worst-case scenario in terms of total trips and VMT throughout the year.

VMT Assessment

The OPR provides screening threshold recommendations that are intended to identify when a project should be expected to cause a less-than-significant impact without conducting a detailed VMT evaluation. The OPR screening thresholds recommendations are based on project size, maps, transit availability, and provision of affordable housing. The OPR recommendations include the screening threshold criteria listed below:

- OPR recommends that office or residential projects not exceeding a level of 15 percent below existing VMT per capita and employee may indicate a less-than-significant impact on VMT.
- OPR recommends that projects (including office, residential, retail, and mixed-use developments) proposed within ½ mile of an existing major transit stop or within ¼ mile of an existing stop along a high-quality transit corridor may be presumed to have a less-than-significant impact on VMT.
- OPR recommends that 100 percent affordable residential development in infill locations be presumed to have a less-than-significant impact on VMT.
- OPR recommends that projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant impact on VMT.
- OPR recommends that local-serving retail developments (considered to be less than 50,000 s.f. in size) may be assumed to cause a less-than-significant impact on VMT.

As discussed above, the average trip increase per day as a result of the proposed project would range from 37 trips for normal Friday night football games and up to 62 trips per day for homecoming and rivalry games. Per the OPR recommendations, land use projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. Therefore, per the OPR recommendation, it can be presumed that the project would have a less-than-significant transportation impact on VMT.

It should be noted that the VMT assessment focuses only on the increase in VMT due to the anticipated increase in attendees since the daily trips and VMT associated with the current attendees of football games are already being generated by the stadium. The proposed lighting would only change the time of day that the existing daily trips would occur.

Intersection Operations, Site Access and Parking Evaluation

Existing Roadway Network

Local access to the school campus is provided via Highway 1, Ocean Avenue, Carmel Hills Drive, and Morse Drive. These roadways are described below.

Cabrillo Highway (SR 1) is a four-lane arterial that runs along most of the Pacific coastline of California between Mendocino County to the north and Orange County to the south. Within the Monterey Bay region, SR 1 connects the cities of Carmel, Monterey, Seaside, and Marina. Within the project vicinity, SR 1 has two lanes in each direction with a two-way left-turn lane and left-turn pockets

provided at intersections north of Ocean Avenue. South of Ocean Avenue, SR 1 narrows to two lanes in the northbound direction, one lane in the southbound direction, and no median lane. The posted speed limit is 45 miles per hour (mph). Access to the school's main parking lot is provided via its signalized intersection with Ocean Avenue and a right-turn only driveway located approximately 700 feet south of Ocean Avenue. There are no sidewalks or bike lanes along SR 1 in the vicinity of the site.

Ocean Avenue is a two-lane east-west roadway that runs between Carmel High School/Carmel Hills Drive and Carmel Beach to the west. The speed limit on Ocean Avenue is 25 mph. On-street parking is prohibited on both sides of the street in the project vicinity. Ocean Avenue provides direct access to the school's parking lot, approximately 100 feet east of its signalized intersection with SR 1.

Carmel Hills Drive is a two-lane north-south roadway that runs north from Carmel High School/Ocean Avenue and terminates as a dead-end. The speed limit on Carmel Hills Drive is 25 mph. On-street parking is prohibited on both sides of the street in the project vicinity between 7 AM and 6 PM. Carmel Hills Drive provides direct access to the school's parking lot, at its intersection with Ocean Avenue, approximately 100 feet east of SR 1.

Morse Drive is a two-lane residential roadway in the vicinity of the project site. It begins at its unsignalized intersection with SR 1 (approximately 1,180 feet south of Ocean Avenue) and extends south to Carmel Hills Drive, where it transitions west to intersect again with SR 1 (approximately 1,500 feet south of the northerly intersection). The speed limit on Morse Drive is 25 mph. On-street parking is prohibited on both sides of the street in the project vicinity. Morse Drive provides direct access to a small parking lot located at the southern end of the school via a gated access drive aisle located approximately 50 feet east of SR 1.

Observed Existing Traffic Conditions

Traffic conditions were observed during the PM peak hour of traffic on a Friday evening (June 11, 2021 between the hours of 5:00 PM to 5:30 PM) in order to identify existing operational deficiencies.

No significant operational issues were observed along the SR 1 corridor between Carpenter Street and Carmel Valley Road. Northbound and southbound traffic volumes were approximately equal, and no lane imbalances were observed. Northbound and southbound queues at the intersections of SR 1/Carpenter Street, SR 1/Ocean Avenue, and SR 1/Carmel Valley Road did not extend to the next adjacent signalized intersection and generally free-flowing traffic conditions were observed between intersections. Traffic conditions generally improved (i.e. shorter queues at intersections and decreasing number of vehicles) over the course of the observation period.

At the intersection of SR 1 and Ocean Avenue, no significant intersection operational deficiencies were observed:

- Southbound queues were not observed to extend past the upstream intersection with Flanders Drive and northbound queues were not observed to extend past Morse Drive. Additionally, the northbound left-turn and southbound left-turn pockets had adequate capacity to accommodate observed queues.
- Eastbound queues (within both the left-turn lane and left/through/right-turn lane) were not observed to extend past the upstream intersection with Hatton Road.
- Westbound queues (within both the left-turn lane and left/through/right-turn lane) were not observed to extend past the upstream intersection with North Carmel Hills Drive.

At the stop-controlled intersection of SR 1 and Morse Drive, short queues of fewer than four vehicles were observed waiting to turn onto SR 1. There were few observed vehicles making a southbound left-turn lane onto Morse Drive.

Intersection Operations

Due to the ongoing COVID-19 pandemic and its effect on normal traffic patterns, the evaluation of operations along SR 1 in the project vicinity relies on traffic data and analysis completed prior to the pandemic. Existing operations at the SR 1/Ocean Avenue intersection were obtained from a traffic analysis for a previously proposed development near the project site. The Rio Ranch Marketplace Traffic Impact Analysis (Keith Higgins, December 29, 2017) indicates that SR 1/Ocean Avenue operates at a Level of Service (LOS) C during the standard PM peak-hour based on counts collected on May 25, 2017.

The weekday PM peak hour typically occurs between the hour of 4:00 PM to 6:00 PM. It is during these times that the most congested traffic conditions occur on a typical weekday. However, the new Friday evening football games would not result in a significant increase in trips during the standard PM peak-hour due to the scheduled start time of Friday evening football games. Vehicular activity for the Friday evening football games is expected to occur later in the evening, approximately 30 minutes before and 30 minutes after the start of the varsity football game at 7:00 PM (approximately 6:30 PM to 7:30 PM). Traffic volumes tend to decrease significantly after 6:00 PM. Therefore, the peak arrival of attendees would not coincide with the standard PM peak hour of traffic. Therefore, it can be assumed that the SR 1/Ocean Avenue intersection would operate at LOS C or better conditions during the peak attendee arrival period of Friday evening football games. An intersection operating at LOS C or better is considered acceptable per Monterey County and Caltrans LOS standards.

Based on intersection LOS conditions at the intersection of SR 1/Ocean Avenue and the observed operations along SR 1, the proposed stadium lighting is not expected to result in an adverse effect on traffic operations along SR 1 that would warrant physical improvements. Furthermore, the traffic associated with the Friday night football games would occur only four to six times per year. The infrequent occurrence and short peak arrival and departure periods of attendees does not warrant major roadway improvements. Rather, it is recommended that the school district consider the implementation of temporary traffic control measures discussed in the following sections.

Existing On-Site Parking Facilities

The school's main parking lot is located along the project site frontage facing SR 1. Two-way access is provided via Ocean Avenue at the northern end of the lot, approximately 100 feet east of SR 1. A secondary access driveway located 700 feet south of Ocean Avenue provides direct right-in and right-out only access to SR 1. The lot provides 165 parking spaces. During Friday evening football games, visitors will be permitted to park in all parking spaces, including staff-designated spaces.

An additional parking lot that provides 36 parking spaces is located at the southern end of the school with two-way access provided via Morse Drive. It is estimated that the parking demand for current Friday afternoon football games is approximately 154 vehicles based on the maximum 500 attendees and the surveyed 3.24 vehicle occupancy rate.

Proposed Parking Operations During Friday Evening Games

It is estimated that the parking demand for normal Friday night football games would be approximately 247 vehicles based on the anticipated 800 attendees and the surveyed 3.24 vehicle occupancy rate. There are no proposed on-site or off-site improvements that would increase parking capacity at the school campus. Therefore, it is likely that on-site parking would be inadequate to meet the parking demand for Friday night football games. Based on the existing capacity of existing parking lots, a

majority of traffic would park within the Ocean Avenue parking lot. Circulation within the parking lot consists of a looping southbound-only drive aisle and northbound-only drive aisle which run between the two site access points located at the north and south ends of the lot. A cut-through aisle between the north-south drive aisles is located approximately half-way between the two access points. Circulation is continuous and the existing one-way operation of the drive aisles minimizes conflicts between inbound and outbound vehicles.

However, inbound queues into the parking lot could form during the peak-hour of arrivals. To facilitate access to the parking lot and to prevent excessive queueing onto SR 1, it is recommended that traffic control officers be deployed at the northerly driveway on Ocean Avenue. Parking lot monitors should monitor the availability of parking spaces and should coordinate with officers to close inbound access when the parking lot is full.

There are currently no left-turn restrictions at the southern driveway. Due to traffic on SR 1, it is anticipated that most outbound vehicles would make right-turns. However, some vehicles may attempt to make outbound left-turns, creating delays and potentially inhibiting circulation within the parking lot. During Friday evening football games, it is recommended that temporary signage be installed at the southerly driveway to prohibit left-turns. The placement of traffic control devices such as traffic cones along SR 1 may not be feasible due to no median being present between the northbound and southbound lanes.

The smaller parking lot on Morse Drive consists of a dead-end drive aisle, requiring vehicles to turn-around when exiting. Due to the limited capacity and to avoid excessive vehicles from attempting to enter the lot, it is recommended that all spaces at the lot be reserved for staff members, players, or volunteers. Signage should be posted at the driveway entrance prohibiting access to the general public.

As noted above, these measures would only be required during football games, which occur 4 to 6 times per year, and during off-peak hours starting approximately 6:00 PM and ending no later than 9:30 PM. Overall, it is recommended that the following measures be included as part of temporary traffic control during football games at the school campus (see Figure 2):

- The school should identify parking demand reduction measures to reduce the effect of football game parking on surrounding residential streets. Measures could include carpool matching, shuttle services from off-site parking, encouraging walking and biking to the games.
- Traffic control officers at the northerly driveway to facilitate flow into and out of the campus parking lot.
- Parking lot monitors to monitor the availability of parking spaces and restrict access when the lot is full.
- Enforce right-in and right-out only turn restrictions at the southerly driveway.
- Prohibit non-staff, non-volunteers, and non-players parking at the Morse Drive parking lot.

Pedestrian and Bicycle Access

Pedestrian facilities in the study area include a crosswalk at the south approach of the SR 1/Ocean Avenue intersection and a sidewalk along the eastbound side of Ocean Avenue between SR 1 and Downtown Carmel. There are no sidewalks and bicycles facilities (i.e. bike lanes and bike routes) along SR 1 and most residential streets in the area, including Morse Drive and Carmel Hills Drive. Therefore, it is anticipated that a majority of attendees would drive to the school campus.

Figure 2
Recommended Temporary Traffic Control Measures

