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## **APPENDIX A**

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

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## Notice of Preparation

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**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](mailto:dpaul@carmelunified.org)

4380 Carmel Valley Road

Carmel, CA 93923

May 12, 2021

Date

  
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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

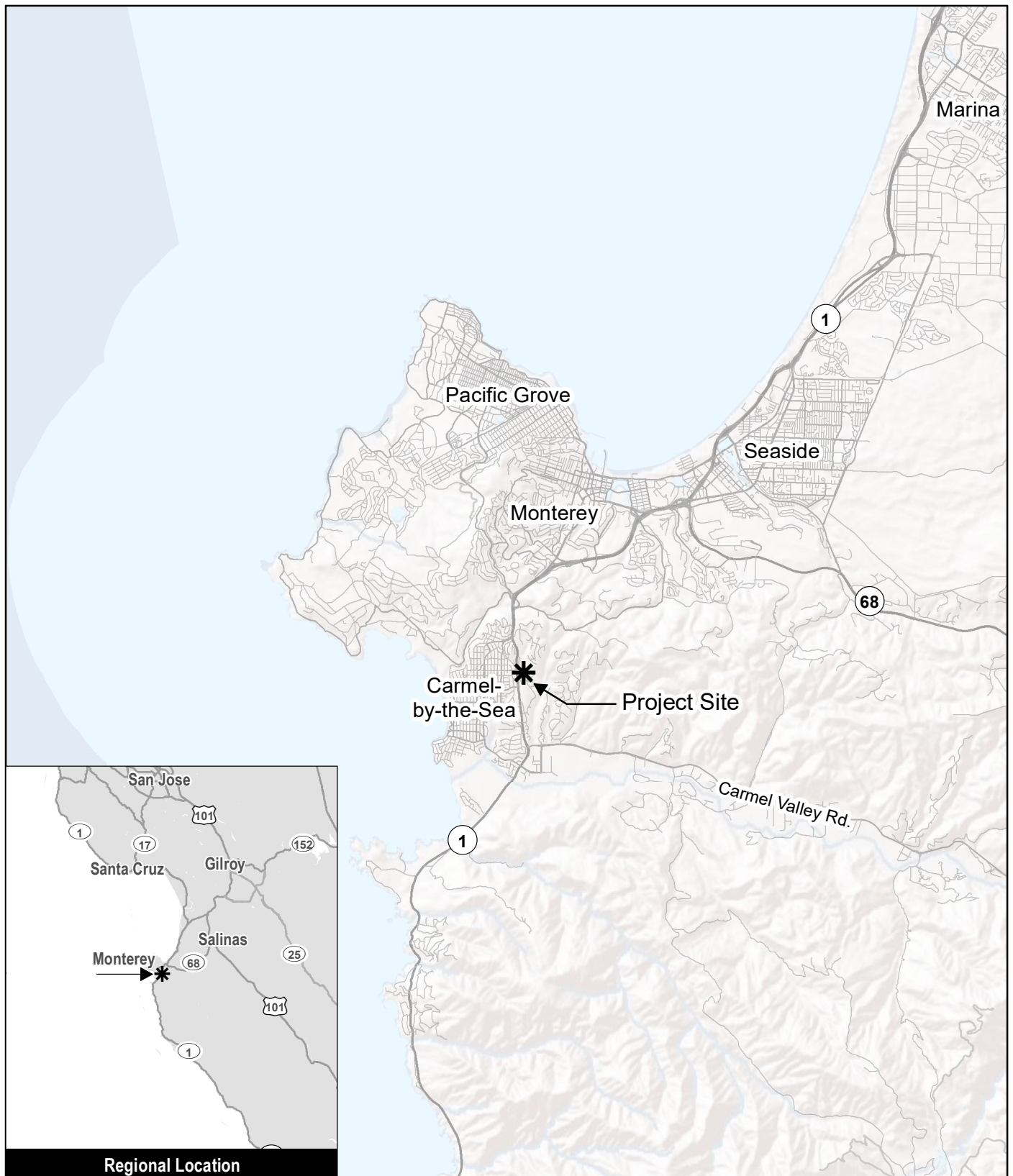
- Division of the State Architect (Written Approval of Plans)

**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



*This side intentionally left blank.*



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

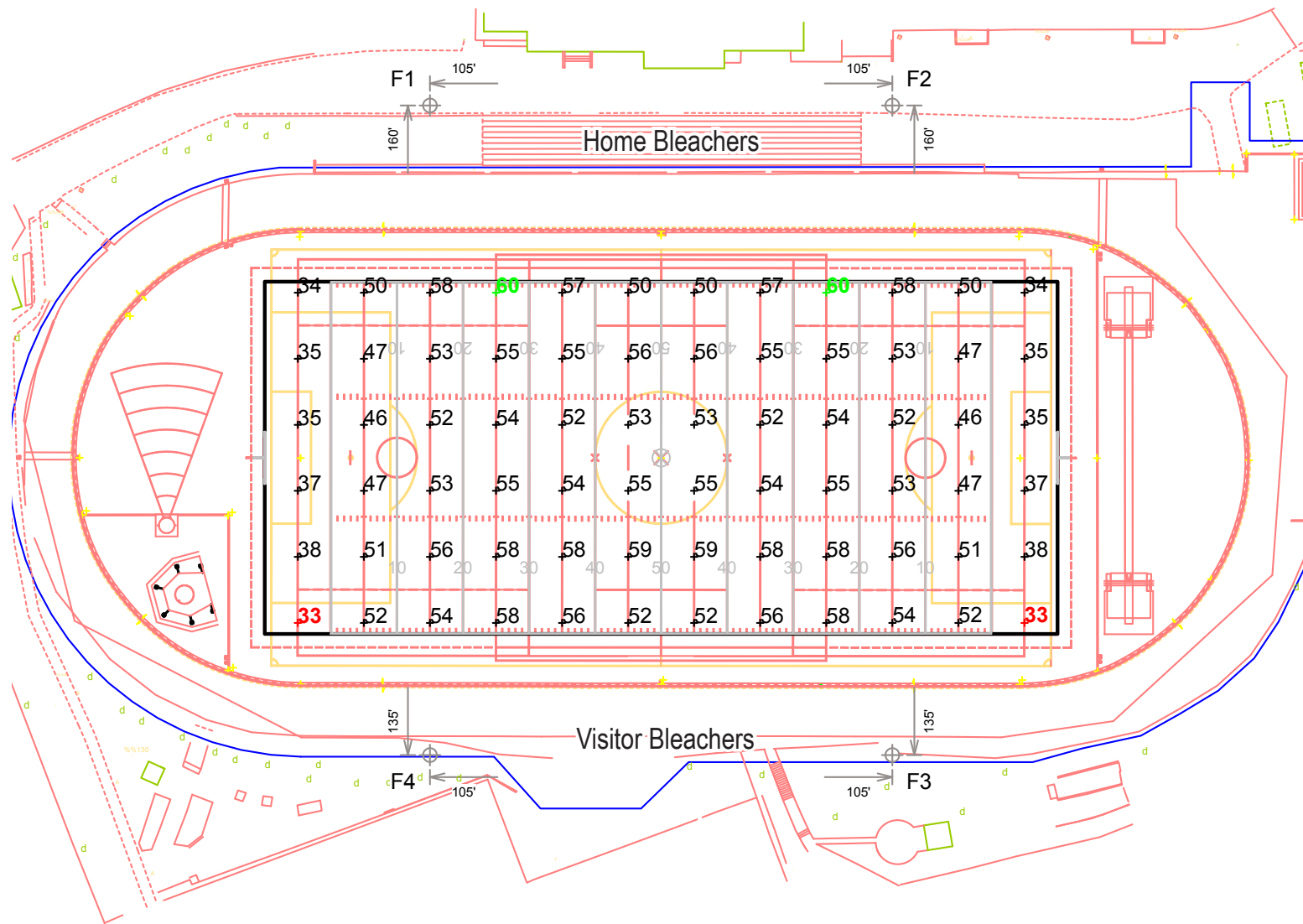
Figure 2

## 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.

- |                                                             |                                                              |                                                                        |
|-------------------------------------------------------------|--------------------------------------------------------------|------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Aesthetics              | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Population/Housing                            |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials       | <input type="checkbox"/> Public Services                               |
| <input checked="" type="checkbox"/> Air Quality             | <input type="checkbox"/> Hydrology/Water Quality             | <input type="checkbox"/> Recreation                                    |
| <input checked="" type="checkbox"/> Biological Resources    | <input type="checkbox"/> Land Use/Planning                   | <input checked="" type="checkbox"/> Transportation                     |
| <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Wildfire                            | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Energy                  | <input type="checkbox"/> Mineral Resources                   | <input type="checkbox"/> Utilities/Service Systems                     |
| <input type="checkbox"/> Geology/Soils                      | <input checked="" type="checkbox"/> Noise                    | <input checked="" type="checkbox"/> 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.

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Yvonne Perez, Chief Business Official

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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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? (7, 21, 26)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? (2, 9, 26)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use? (2, 4, 5, 26)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations? (1, 7, 27)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in other emissions, such as those leading to odors adversely affecting a substantial number of people? (1, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5? (1, 3, 5, 7, 22, 25)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries? (1, 3, 5, 7, 22, 25)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (1, 7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Strong seismic ground shaking? (2, 3, 5, 7, 10, 11, 12, 13, 23, 24)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Seismic-related ground failure, including liquefaction? (2, 3, 5, 7, 10, 11, 12, 13, 23, 24)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Landslides? (2, 3, 5, 7, 10, 11, 12, 13, 23, 24)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil? (7, 12, 13, 23, 24)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, creating substantial direct or indirect risks to life or property? (7, 12, 13, 23, 24)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (2, 3, 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (1, 7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (1, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Impede or redirect flood flows? (1, 5, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (1, 2, 3, 5, 7, 21)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (1, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive ground-borne vibration or ground borne noise levels? (1, 2, 3, 7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (1, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Police protection? (1, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Schools? (1, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks? (1, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other public facilities? (1, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA guidelines section 15064.3, subdivision (b)? (1, 7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access? (1, 7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 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 ()	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(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. ()	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (1, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (1, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? (1, 2, 3, 7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 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.

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## NATIVE AMERICAN HERITAGE COMMISSION

Governor's Office of Planning &amp; 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.**

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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](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](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](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](mailto:Nancy.Gonzalez-Lopez@nahc.ca.gov).

Sincerely,



Nancy Gonzalez-Lopez  
Cultural Resources Analyst

cc: State Clearinghouse



**DEPARTMENT OF TRANSPORTATION**

CALTRANS DISTRICT 5  
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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](mailto: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](mailto: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](mailto: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 14<sup>th</sup>, 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.<sup>1</sup>

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.

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<sup>1</sup> 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 14<sup>th</sup>, 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 14<sup>th</sup>, 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](mailto: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  
Carmel Unified School District  
June 14<sup>th</sup>, 2021  
Page 4

## **FILING FEES**

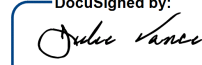
The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order 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](mailto:aimee.braddock@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
FA83F09FE08945A...  
Julie A. Vance  
Regional Manager

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



Dan Paul &lt;dpaul@carmelunified.org&gt;

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## Stadium Lights & EIR at CHS

1 message

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**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.

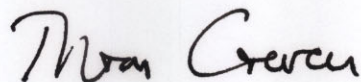
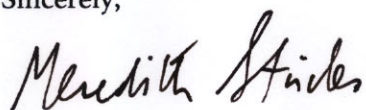
2. The proposed stadium lights would break promises made in the past to the community either by deed restriction or agreement and open up litigation issues that would be costly to taxpayers and delay solutions to the new state law.

### **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 &lt;dpaul@carmelunified.org&gt;

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**RE: SPORTS LIGHTING @ HIGH SCHOOL**

1 message

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**Meredith Nole** <ilight8@aol.com>

Tue, Jun 8, 2021 at 2:10 PM

Reply-To: Meredith Nole &lt;ilight8@aol.com&gt;

To: "dpaul@carmelunified.org" &lt;dpaul@carmelunified.org&gt;

Cc: Meredith Nole &lt;ilight8@aol.com&gt;

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 &lt;dpaul@carmelunified.org&gt;

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## Stadium Lighting

1 message

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**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>

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## Re: NOP CHS Stadium Lights

1 message

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**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.

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 **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 &lt;dpaul@carmelunified.org&gt;

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**Carmel High School Stadium Lights**

1 message

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**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 &lt;dpaul@carmelunified.org&gt;

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## High School Lights

1 message

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**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 &lt;dpaul@carmelunified.org&gt;

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## Carmel High School Lights v. Night Sky

1 message

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**larry@mtntools.com** <larry@mtntools.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, cvcaboard@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 effect 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