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Notice of Preparation

To: Interested Parties

Date: May 12, 2021

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

Lead Agency: Carmel Unified School District

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

Project Title: Carmel High School Stadium Lights

Project Applicant: Carmel Unified School District

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

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

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

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

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

Date: Wednesday, May 26, 2021

Time: 5:30 PM

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

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

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

Dan Paul, Director of Facilities & Transportation

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

Carmel Unified School District

Email: dpaul@carmelunified.org

4380 Carmel Valley Road

Carmel, CA 93923

May 12, 2021

Date



Yvonne Perez, Chief Business Official
Carmel Unified School District

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A. BACKGROUND

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

Setting

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

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

Description of Project

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

Other Public Agencies Whose Approval is Required

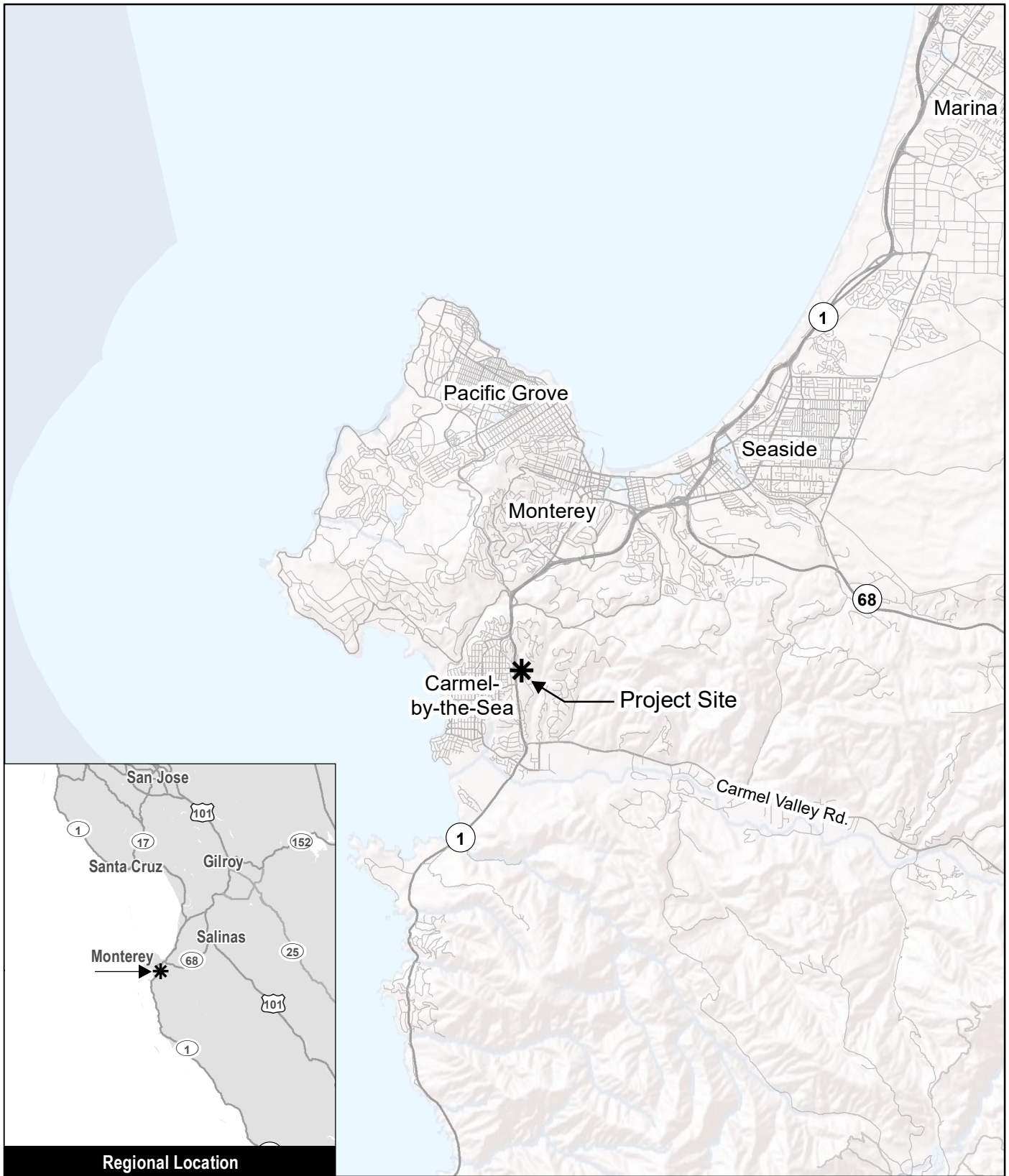
- Division of the State Architect (Written Approval of Plans)

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

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

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

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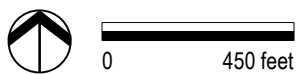
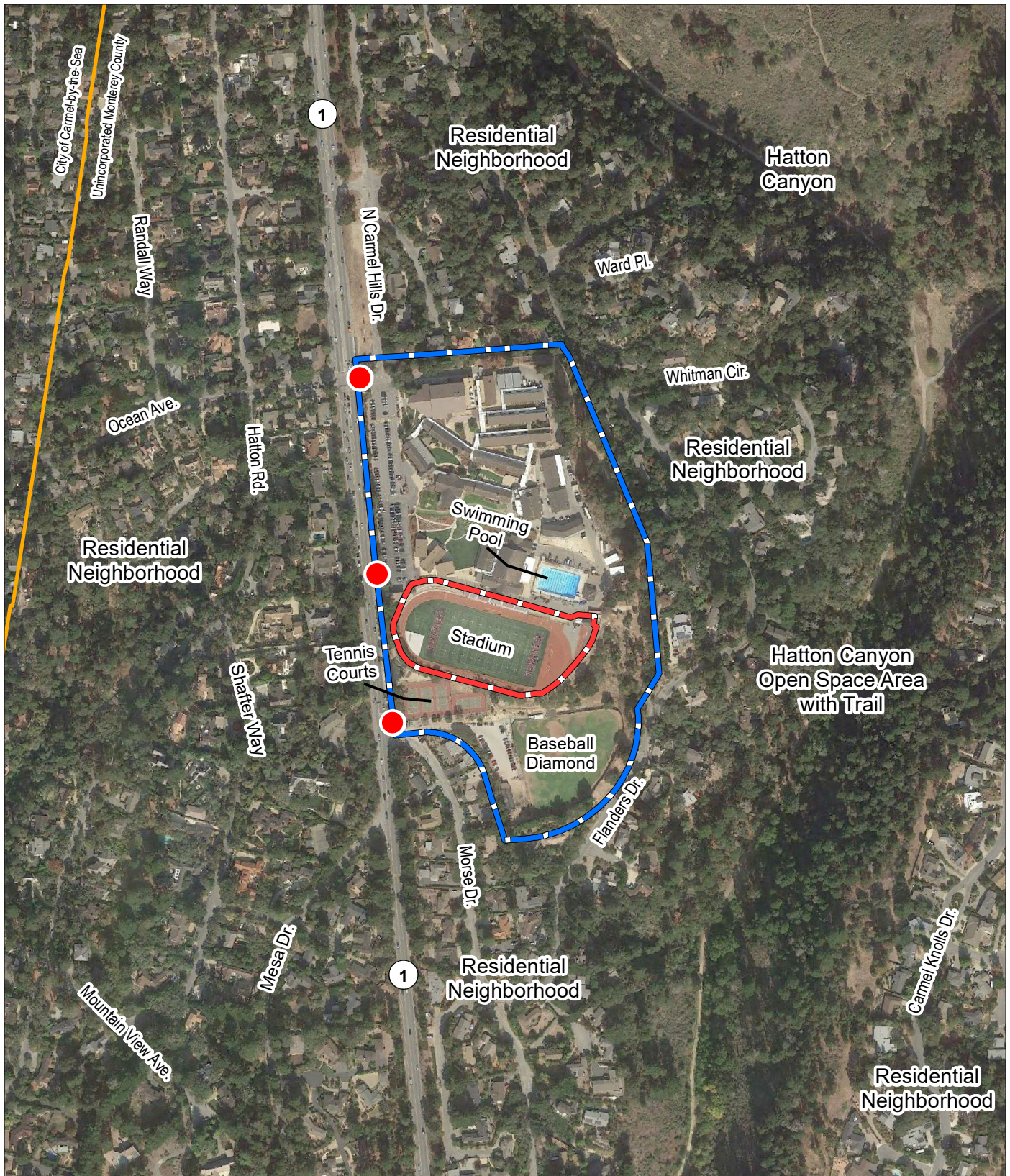
Source: ESRI 2019





Figure 1

Regional Location



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

Source: Google Earth 2018
Monterey County GIS 2019

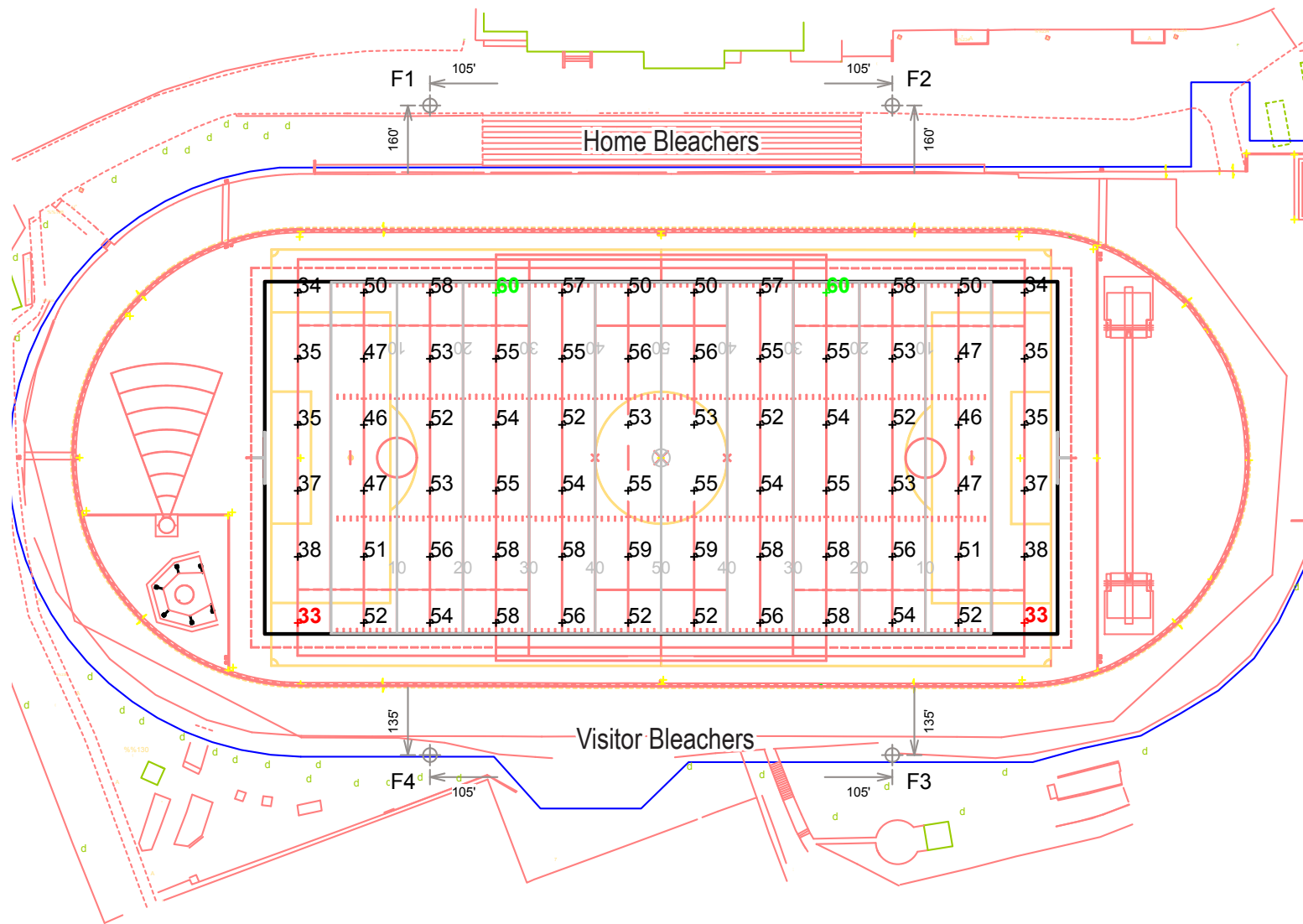
Figure 2

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.

Yvonne Perez, Chief Business Official

Date

D. EVALUATION OF ENVIRONMENTAL IMPACTS

Notes

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

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

1. AESTHETICS

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

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista? (1, 2, 3, 5, 6, 7, 21, 26)	<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"/>

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.

Carmel High School Stadium Lights

- 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.

E. SOURCES

1. Paul, Dan, Director of Facilities & Transportation, Carmel Unified School District. E-mail message to consultant regarding proposed stadium lighting, 9 February 2021.
2. Monterey County. October 2010a. *2010 Monterey County General Plan*. Monterey, CA. Accessed March 31, 2021. <https://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency-rma-/planning/resources-documents/2010-general-plan>
3. ----- . September 2008. *2007 Monterey County General Plan Draft Environmental Impact Report*. Monterey, CA.
4. ----- . September 1997. Monterey County Zoning Ordinance Title 21 (For Inland Areas). Monterey, CA. Accessed March 31, 2021. <https://www.co.monterey.ca.us/home/showdocument?id=22573>
5. ----- . 2021a. GIS Mapping and Data website. Accessed March 31, 2021. <https://www.co.monterey.ca.us/government/about/gis-mapping-data>
6. ----- . January 26, 2010b. *Monterey County Scenic Highway Corridor & Visual Sensitivity Map – Greater Monterey Peninsula*. Accessed March 31, 2021. <https://www.co.monterey.ca.us/home/showdocument?id=45898>
7. Musco Lighting. 2021. *Carmel High School Football Illumination Summary (Preliminary)*. Oskaloosa, IA.
8. California Department of Conservation. 2021. *California Important Farmland Finder*. Accessed March 31, 2021. <https://maps.conservation.ca.gov/DLRP/CIFF/>
9. Monterey County. 2021b. “Monterey County Agricultural Commissioner’s Office - Williamson Act Contracts Map (GIS).” Accessed March 31, 2021. <https://montereyco.maps.arcgis.com/apps/webappviewer/index.html?id=9aa9d5bf30904f3c904eb5fe869f62b7>
10. ----- . 2021c. “Geologic Hazards Map for Monterey County.” Accessed April 6, 2021. <https://montereyco.maps.arcgis.com/apps/webappviewer/index.html?id=80aad38518a45889751e97546ca5c53>
11. California Geological Survey (CGS). 2016. “CGS Map Sheet 48: Earthquake Shaking Potential.” Available: Accessed April 7, 2021. <https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=6c4b37155b6a40e1b40f8211f8d8dde7>

12. USDA Natural Resources Conservation Service (NRCS). 2021. Web Soil Survey website. Accessed April 7, 2021. <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>
13. ----- . 1978. *Soil Survey of Monterey County, California*. Accessed April 7, 2021. https://www.nrcs.usda.gov/Internet/FSE_MANUSCRIPTS/california/CA053/0/monterey.pdf
14. California Department of Toxic Substances Control (DTSC). 2021. Envirostor website. Accessed April 7, 2021. <https://www.envirostor.dtsc.ca.gov/public/>
15. California Water Resources Control Board. 2021. GeoTracker website. Accessed April 7, 2021. <https://geotracker.waterboards.ca.gov/>
16. Monterey County Airport Land Use Commission. February 2019. *Airport Land Use Compatibility Plan*. Salinas, CA. <https://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency-rma-/planning/resources-documents/airport-land-use-plans>
17. California Department of Forestry and Fire Protection (CALFIRE). November 2007. "Monterey County Fire Hazard Severity Zones in SRA." Accessed April 7, 2021. https://osfm.fire.ca.gov/media/6726/fhszs_map27.pdf
18. Cypress Fire Protection District. March 2018. Cypress Fire Protection District Fire Defense Plan. Accessed April 7, 2021. <https://cypressfire.org/wp-content/uploads/FIRE-DEFENSE-PLAN-Cypress-Approved-Sept-17-revise-3.18.pdf>
19. California Department of Fish and Wildlife (CDFW). 2021. California Natural Diversity Database (CNDDDB) online database. Accessed February 6, 2021. <https://wildlife.ca.gov/data/cnddb>
20. Carmel Area Wastewater District (CAWD). 2021. District Map website. Accessed April 9, 2021. <https://www.cawd.org/district-map>
21. Google Earth aerial imagery
22. Carmel Unified School District. 2019. *Carmel Unified School District Facilities Master Plan*. Accessed April 11, 2021. <https://www.carmelunified.org/site/handlers/filedownload.ashx?moduleinstanceid=9505&dataid=25001&FileName=CUSD%20Facilities%20Master%20Plan%202019.pdf>
23. Cleary Consultants, Inc. October 2013. *Draft Geotechnical Investigation New Synthetic Turf Sports Field, Carmel High School, 3600 Ocean Avenue, Carmel, California*. Los Altos, CA.

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24. ----- . November 2014. *Supplemental Geologic Hazards Investigation New Press Box, Carmel High School, 3600 Ocean Avenue, Carmel, California*. Los Altos, CA.
25. Archaeological Resource Management. April 14, 2021. *Cultural Resource Evaluation of the Carmel High School Stadium Lights Project in the County of Monterey*. San Jose, CA.
26. Consultant Site Investigation, April 13, 2021.
27. Monterey Bay Unified Air Pollution Control District. 2008. *CEQA Air Quality Guidelines*. Monterey, CA. Accessed April 25, 2021.
https://www.mbard.org/files/f665829d1/CEQA_full+%281%29.pdf