

Summary Form for Electronic Document Submittal

Form F

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH # 2021050293

Project Title: Carmel High School Stadium Improvements

Lead Agency: Carmel Unified School District

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Project Location: Unincorporated Monterey
City *County*

Project Description (Proposed actions, location, and/or consequences).

The Carmel Unified School District is proposing the following improvements at Carmel High School located at 3600 Ocean Avenue in an unincorporated area of Monterey County, west of the City of Carmel-by-the-Sea and immediately east of State Route 1: stadium field lights (70 to 80 feet high); new 2,400-square foot storage building with a standing, viewing platform adjacent to the home bleachers; a new parking area with 35 standard spaces east of the existing swimming pool; a new parking lot with 76 standard spaces replacing the existing tennis courts south of the stadium, including a new 18-foot drive aisle connecting the existing main campus parking lot to the north, and a new pedestrian walkway. This parking lot also includes a 20-foot driveway providing access to Morse Drive and the existing access to the baseball field parking to the east; and replacing light fixtures at the swimming pool with LED light fixtures.

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

The revised draft EIR identified the following potentially significant impacts which are all reduced to a less than significant level with the mitigation measures identified under each significant impact:

Biological Resources

Potential Effect on Special-Status Species (Hoary Bat)

Mitigation Measure 7-2. Within 14 days prior to tree removal, tree trimming or other construction activities, the school district will retain a qualified biologist to conduct a habitat assessment for bats and potential roosting sites in trees to be trimmed, and in trees and structures within 50 feet of the development footprint. In the event that construction activities are suspended for 15 consecutive days or longer, these surveys will be repeated. These surveys will include a visual inspection of potential roosting features (bats need not be present) and a search for presence of guano within and 50 feet around the project site. Cavities, crevices, exfoliating bark, and bark fissures that could provide suitable potential nest or roost habitat for bats will be surveyed. Assumptions can be made on what species is present due to observed visual characteristics along with habitat use, or the bats can be identified to the species level with the use of a bat echolocation detector such as an "Anabat" unit. Potential roosting features found during the survey will be flagged or marked. Locations off the site to which access is not available may be surveyed from within the site or from public areas.

If no roosting sites or bats are found, a letter report confirming absence will be submitted by the biologist to the school district prior to the commencement of tree removal, trimming and construction activities and no further mitigation is required.

If bats or roosting sites are found, a letter report and supplemental documents will be provided by the biologist to the

school district prior to the commencement of tree removal, tree trimming and construction activities and the following monitoring, exclusion, and habitat replacement measures will be implemented:

a. If bats are found roosting outside of the nursery season (May 1 through October 1), they shall be evicted as described under (b) below. If bats are found roosting during the nursery season, they will be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. If the roost is determined to not be a maternal roost, then the bats will be evicted as described under (b) below. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 50-foot buffer zone (or different size if determined in consultation with the California Department of Fish and Wildlife) will be established around the roosting site within which no construction activities including tree removal or structure disturbance will occur until after the nursery season.

b. If a non-breeding bat hibernaculum is found in a tree or snag scheduled for removal or on any structures within 50 feet of project disturbance activities, the individuals will be safely evicted, under the direction of a qualified bat biologist. If pre-construction surveys determine that there are bats present in any trees or structures to be removed, exclusion structures (e.g., one-way doors or similar methods) will be installed by a qualified biologist. The exclusion structures will not be placed until the time of year in which young are able to fly, outside of the nursery season. Information on placement of exclusion structures will be provided to the California Department of Fish and Wildlife prior to construction. If needed, other removal methods could include: carefully opening the roosting area in a tree or snag by hand to expose the cavity and opening doors/windows on structures, or creating openings in walls to allow light into the structures. Removal of any trees or snags and disturbance within 50 feet of any structures will be conducted no earlier than the following day (i.e., at least one night will be provided between initial roost eviction disturbance and tree removal/disturbance activities). This action will allow bats to leave during dark hours, which increases their chance of finding new roosts with a minimum of potential predation.

c. Bat Mitigation and Monitoring Plan. If roosting habitat is identified, a Bat Mitigation and Monitoring plan will be prepared and implemented to mitigate for the loss of roosting habitat. The plan will include information pertaining to the species of bat and location of the roost, compensatory mitigation for permanent impacts, including specific mitigation ratios and a location of the proposed mitigation area, and monitoring to assess bat use of mitigation areas. The plan will be submitted to California Department of Fish and Wildlife for review and approval prior to the bat eviction activities or the removal of roosting habitat.

The school district will be responsible for implementation of this mitigation measure. Compliance with this measure will be documented, prior to the commencement of tree removal (if any), trimming and construction activities.

Potential Effect on Special-Status Species (Nesting Raptors and Migratory Birds)

Mitigation Measure 7-3. Prior to tree removal (if any), demolition, and construction activities, to avoid impacts to nesting birds during the nesting season (February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), or if construction activities are suspended for at least 14 days and recommence during the nesting season, a qualified biologist will conduct nesting bird surveys.

a. Two surveys for active bird nests will occur within 14 days prior to start of construction, with the final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding each work area are typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys will be conducted at the appropriate times of day to observe nesting activities. Locations off the site to which access is not available may be surveyed from within the site or from public areas. A report documenting survey results and plan for active bird nest avoidance (if needed) will be completed by the qualified biologist prior to construction activities.

b. If the qualified biologist documents active nests within the project site or in nearby surrounding areas, an appropriate buffer between each nest and active construction will be established. The buffer will be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist will conduct baseline monitoring of each nest to characterize "normal" bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist will monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not

possible, the qualified biologist or construction foreman will have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active.

The school district will be responsible for implementation of this mitigation measure. Compliance with this measure will be documented, prior to the start of tree removal if any, trimming and construction activities.

Potential Tree Removal

Mitigation Measure 7-6. Prior to any ground disturbance, an International Society of Arboriculture (ISA)-certified arborist will conduct a tree survey and prepare an evaluation report with associated data and location map for all potentially affected trees on and immediately adjacent to the project site. The school district will follow the arborist's recommendations, such as the planting of replacement trees in appropriate on-site or off-site areas, along with any required maintenance and monitoring.

Tribal and Cultural Resources

A Potential Adverse Substantial Adverse Change in the Significance of a Historical Resource Pursuant or a Unique Archaeological Resource

Mitigation Measure 13-1. 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, school district staff notified, the Monterey County Housing and Community Development Department 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.

Mitigation Measure 13-2. 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."

Noise

Construction Activities Could Cause a Substantial Temporary Noise Increase

Mitigation Measure 10-3. The school district will limit construction activities to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday, with no construction on Sunday or holidays, and require construction equipment to be adequately maintained and muffled. These requirements will be included in construction plans and contracts.

Transportation

Construction Traffic Could Result in Safety Impacts When School is in Session

Mitigation Measure 11-3. The school district will prepare a Construction Management Plan prior to the commencement of construction preparation activities. The plan will be implemented during construction and include, but not be limited to, the following:

- a. Provide for the appropriate control measures, including barricades, warning signs, speed control devices, flaggers, and other measures to mitigate potential traffic hazards;
- b. Ensure coordination with on-site campus staff;
- c. Prohibit heavy vehicle traffic to and from the project site during the hours when the majority of students are entering and exiting the campus;
- d. Store construction equipment in a safe location during the construction phase of the project.

Mitigation Measure 11-4. The Carmel Unified School District will adopt and implement all measures outlined in the Traffic Management Plan prepared for Carmel High School. The proposed Traffic Management Plan for Carmel High School is included in Appendix K. The final, approved plan will include, but not be limited to the following measures:

- a. **Off-Campus Parking:** During night football games and other special events, the parking lot at Carmel Middle School located at 4380 Carmel Valley Road will be utilized for local attendees. Carmel Middle School has 199 striped parking spaces and these parking spaces can be doubled by using other parts of the Carmel Middle School campus. All students, parents and other Carmel High School-based attendees will be encouraged to drive to the Carmel Middle School campus and then be shuttled to Carmel High School. The main campus parking located off of Ocean Avenue which has 174 parking stalls and the new 76 tennis court stalls (totally 250 stalls) will be reserved for all parking generated by the visiting team. The second parking lot which has 35 parking stalls and is located immediately south of the stadium and tennis courts next to the baseball diamond would be reserved for players and coaches only of the home team. On game days, Carmel High School students would have to move their parked cars from the Carmel High School campus to Carmel Middle School;
- b. **Shuttle Service from Carmel Middle School:** Bus pick-up services will be provided for attendees who will park at Carmel Middle School during the night football games and other special events. This service would pick-up local attendees from the middle school and shuttle them to the event on the Carmel High School campus. In addition, a drop-off / pick-up area will be established in the main parking lot for local attendees. The designated area will be at the concrete apron near the flagpole. However, these drop-off / pick-up vehicles will not be permitted to park at Carmel High School. With a capacity of 56 passengers per bus, up to 18 bus trips could be required before and after the game to accommodate about 1,000 "home" attendees parking at Carmel Middle School and transporting them between the middle school and the football stadium at Carmel High School. During the rivalry and home coming football games, approximately 1,500 attendees are anticipated to attend. It is anticipated that five to six buses would be required to shuttle attendees from Carmel Middle School. A round trip for each bus is estimated to take approximately 30 minutes including loading and unloading times;
- c. **Alternative Mode Encouragement:** Employees and students can be asked to consider alternate mode of transportation during the night football games and special events. Families and employees within one mile of campus can be asked to consider walking to school. In addition, parents will be asked to drop off and pick up their children at the designated drop-off location at the concrete apron near the flagpole in the main CHS parking lot.;
- d. **On-Site Amenities:** Amenities on-site include provision of Traffic Management Plan contract persons, and related information at Carmel High School during night football games and special events. The Traffic Management Plan contact persons will be from on-site employees and will provide information and resources on transportation choices available to parents, students and visitors during evening games and events. Prior to the beginning of school year, the transportation coordinator will be provided transportation information packets that include information Carmel Unified School District shuttle bus options for events. To better inform parents of new students and new employees of the available transportation options to Carmel High School during games and special events, information transportation packets can be distributed upon hire and at new student/parent orientations. By providing detailed overview of the available options faculty and students can plan better to reach campus during night football games and special events.
- e. **On-Campus Supervision:** Carmel High School will appoint game day and weekend supervisors to supervise traffic and parking during nighttime football games, special events, and as needed. One supervisor will be needed at the main entrance and exit driveway, one supervisor will be needed at the entrance only driveway located south of Ocean Avenue and one supervisor will be needed at the Morse Drive parking lot at the tennis courts. The appointed employees will also be on call should an unforeseen disruption occur. The supervisors will coordinate with traffic control officers to direct

traffic to appropriate parking areas and from the parking areas at the end of the game or a special event. They will be responsible for guiding motorists and enforcing traffic regulations in the main campus parking area.

f. **Parking Management:** Areas immediately around the Carmel High School campus will have barricade-mounted No Event Parking signs installed in several locations, limiting the area to residents only during special events. Carmel Hills Drive, Stewart Place and Morse Drive between State Route 1 and Flanders Drive will be restricted to resident traffic prior to and during each home game. Carmel High School will submit encroachment permit applications to the county to authorize signs on the roadways outside of the jurisdiction of Carmel High School. Although most fines for parking violations are relatively inexpensive, a towed vehicle can prove expensive when wrecker fees are included. Violations that can result in towing include: parking along yellow curbs and inside fire lanes; blocking a fire hydrant, driveway, street, or alley; illegal use of handicapped parking; and illegally parking on private property. No Event Parking signs, traffic cones and barricades will be installed in the vicinity of the Carmel High School campus.

The following significant impact could not be adequately mitigated and therefore, is a significant and unavoidable impact:

Aesthetics

New Lighting would Result in Light Pollution and the New Sources of Light and Glare Would be Visible from and towards County-Designated Visually "Sensitive" and "Highly Sensitive" Areas and Slightly Modify the Visual Character and Quality of the Site

Mitigation Measure 5-2a Carmel Unified School District will prepare and adopt a policy regarding use of field lights for home games and practices at the Carmel High School Stadium and will implement the following use restrictions consistent with Table 4-2, Proposed Schedule of Stadium Uses (After Installation of Field Lights), found in Section 4.0, Project Description, of this revised draft EIR:

Games. Lights shall be used only for up to the following number of nighttime events for each of the following Carmel High School field sports teams:

- Football. Six games;
- Girls field hockey. Ten games;
- Boys and girls soccer. Twelve games for each team;
- Boys and girls lacrosse. Twelve games for each team; and
- Boys and girls track and field. Four meets (combined).

This would total forty-four games and/or meets combined between football, soccer, field hockey, lacrosse, and track and field. Football games shall end by 9:30 p.m. and lights shall be turned off by 10:00 p.m. Field sport games other than football shall end by 7:00 p.m. and lights shall be turned off by 7:30 p.m.

Practices. All field sports practices shall end by 8:00 p.m. with lights turned off by 8:30 p.m.

Mitigation Measure 5-2b Carmel Unified School District will prepare and adopt a policy that restricts use of Carmel High School stadium and pool facility by non-school related groups after dark. Any use by non-school related groups shall end before sunset so that field and/or pool lighting does not need to be used.

Mitigation Measure 5-2c Prior to the first lighted practice or event, the Carmel Unified School District shall consult with an energy specialist regarding how to reduce the intensity of existing lighting at the campus that is visible off-campus, and implement the specialist's recommendations.

Mitigation Measure 5-2d Once stadium lights are installed and pool facility light fixtures are replaced, the school district shall have the stadium and pool lights professionally evaluated and validated as conforming to the International Dark-Sky Association's (IDA) Community Friendly Sports Lighting Program (Phase II – Field Verification). Prior to the first lighted practice or event, the school district shall obtain an IDA Field Verification Letter and shall be posted on the school district's website for public review.

continued

If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

Responses to the Notice of Preparation from public agencies include: CDFW recommended addressing potential impacts to the federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*), species of special-status bats, and special-status plants, including Hickman's onion (*Allium hickmanii*), and Monterey clover (*Trifolium trichocalyx*). NAHC submitted a response requesting the school district conduct the required tribal consultation process under AB 52 with geographically-affiliated tribes. Caltrans (District 5) submitted a response which notes the requirement for a vehicle miles traveled assessment and the issuance of an encroachment permit if any activities were to be proposed in the Caltrans right-of-way among other standard recommendations and requirements. In addition, a comment letter was received from the Transportation Agency for Monterey County (TAMC) which supports a detailed traffic analysis to inform the EIR about impacts to local and regional road networks, including State Route 1 intersections from Carpenter Street to Carmel Valley Road, encourages the evaluation of all potential nighttime special events, and consideration of safe bicycle and pedestrian connections to the project site.

Responses to the Notice of Preparation by the public identified aesthetic impacts associated new sources of nighttime light generated by stadium lighting and impacts on scenic resources as well as traffic and parking concerns generated by additional attendees of sporting events at Carmel High School Stadium. Other comments received from neighbors of the high school addressed possible biological impacts to the adjacent Hatton Canyon area.

During the public review period for the original draft EIR, several of the same issues were raised numerous times in both verbal and written letters and emails received by the school district on the draft EIR. Members of the public submitted comments on the draft EIR regarding the following issues:

- light and noise impacts on wildlife;
- existing parking capacity at the high school;
- cumulative traffic impacts;
- the potential for the four new stadium lights to generate light pollution;
- the accuracy of the visual simulations included in the draft EIR;
- light and glare impacts to wildlife;
- whether the stadium lights would be "Dark-Sky" certified by the International Dark-Sky Association (IDA);
- cumulative light and glare impacts;
- cumulative noise impacts;
- increased noise levels as a result of increased attendance at sporting events at the high school stadium, as well as the associated increase in traffic noise;
- the increase in traffic, emergency access, and the existing and future impact on parking in the adjacent neighborhoods; and
- consideration of an alternative that would construct a new lighted, stadium at another location such as Carmel Middle School.

Provide a list of the responsible or trustee agencies for the project.

- Division of the State Architect (DSA) (Written Approval of Plans)
- County of Monterey (Encroachment Permit)
- Caltrans (Encroachment Permit)
- Monterey Air Resources District (Authority to Construct and Permit to Operate)