

Final EIR

# Carmel High School Stadium Improvements

SCH# 2021050293

November 18, 2022



Carmel Unified School District



Prepared by  
EMC Planning Group





FINAL EIR

**CARMEL HIGH SCHOOL  
STADIUM IMPROVEMENTS  
SCH# 2021050293**

**PREPARED FOR**

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November 18, 2022

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## 1.1 CEQA Requirements

Before approving a project that may cause a significant environmental impact, the California Environmental Quality Act (CEQA) requires the Carmel Unified School District (school district), acting as the Lead Agency under CEQA, to prepare and certify a final environmental impact report (EIR). The contents of a final EIR are specified in CEQA Guidelines Section 15132, which states that:

The final EIR shall consist of:

- a) The draft EIR or a revision of the draft.
- b) Comments and recommendations received on the draft EIR either verbatim or in summary.
- c) A list of persons, organizations, and public agencies commenting on the draft EIR.
- d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- e) Any other information added by the Lead Agency.

All comments addressing environmental issues received on the Revised Draft EIR (RDEIR) in the manner specified in the Notice of Completion/Availability during this second public review period (August 25, 2022 to October 10, 2022 at 5:00 p.m.) have been addressed in this final EIR. CEQA Guidelines section 15204(a) states that in reviewing a draft EIR, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. (Pub. Res. Code, §21091(d)(2)(B); CEQA Guidelines, §15204(a).) Likewise, a lead agency also need not respond to general reference materials submitted in support of comments, comments that repeat those already considered, or comments that are clearly

irrelevant. (*Environmental Protection Info. Ctr. v. Dept. of Forestry & Fire Protection* (2008) 44 Cal.4th 459, 483 & 487.) According to CEQA Guidelines section 15204(a), when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR. (See also, CEQA Guidelines, §§15088(c) & 15132(d).)

CEQA Guidelines section 15204(c) states that reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines section 15088 requires the lead agency to provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an EIR. The only public agency to submit a comment letter on the revised draft EIR was the California Department of Fish & Wildlife (Central Region). Written responses to comments have been prepared to address CDFW comments on the project and have been sent to the agency on November 18, 2022, which is at least 10 days prior to the scheduled special board meeting at 5:30 p.m. on November 29, 2022, at which time, or as soon thereafter as practical, the Board of Education will consider certifying the final EIR.

CEQA Guidelines 15095(a) also requires that the lead agency file a copy of the final EIR with the appropriate planning agency of any city, county, or city and county where significant effects on the environment may occur. The school district will file a copy of this final EIR with County of Monterey Housing and Community Development (Planning Services) as they are the appropriate planning agency of the county where the significant effects on the environment may occur.

## 1.2 Purpose of Public Review

CEQA Guidelines section 15200 indicates that the purposes of the public review process include the following:

- sharing expertise;
- disclosing agency analysis;
- checking for accuracy;
- detecting omissions;
- discovering public concerns; and
- soliciting counter proposals.



In compliance with CEQA public noticing requirements, the school district prepared a draft EIR for the proposed project that was circulated for public review from August 13, 2021 to September 27, 2021. The school district received 46 comment letters and emails during this public comment period, and five verbal comments during a September 8, 2021 Board of Education hearing on the draft EIR.

Upon review of the public comments, the school district elected to respond to timely comments on the draft EIR by revising and recirculating it for a second round of public review and comment in accordance with CEQA Guidelines 15088.5. On August 25, 2022, the school district issued a Notice of Completion/Availability and released the revised draft EIR (“RDEIR”) for a 45-day public review and comment period, which ended on October 10, 2022 at 5:00 p.m. A public hearing was also held on September 6, 2022, to receive public comments on the revised draft EIR. The hearing was held during a special meeting of the Board of Education at 5:30 p.m. at the Carmel Middle School Gymnasium and was recorded. The hearing was repeated at 6:30 p.m. The Notice of Completion/Availability and the revised draft EIR provided the requisite notice set forth in Section 15088.5(f)(1) of the CEQA Guidelines. The school district complied with all public notice requirements under CEQA, the CEQA Guidelines, and other applicable law. As a result of these notification efforts, written and verbal comments were received from one agency, as well as organizations, and individuals on the content of the revised draft EIR.

### 1.3 Final EIR

This final EIR has been prepared to address timely comments received on the revised draft EIR in the manner specified in the Notice of Completion/Availability during the public review period (August 25, 2022 to October 10, 2022 at 5:00 p.m.) and, together with the revised draft EIR, constitutes the complete *Carmel High School Stadium Improvements Final EIR*. This final EIR is organized into the following sections:

- Section 1 contains an introduction to this final EIR;
- Section 2 contains a list of persons, organizations, and public agencies commenting on the RDEIR, and written and verbal comments on the RDEIR and the responses to those comments; and
- Section 3 contains changes to the RDEIR. Such changes clarify, amplify, or otherwise make minor modifications to the RDEIR.

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# 2.0 Comments on the Revised Draft EIR

## 2.1 CEQA Requirements

### Responding to Comments on the Revised Draft EIR

This revised draft EIR was circulated for a 45-day public review period. All comments addressing environmental issues received on the RDEIR during this second public review period are addressed in this final EIR. CEQA Guidelines section 15204(a) states that in reviewing a draft EIR, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.

CEQA Guidelines section 15204(c) states that reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to section 15064, an effect shall not be considered significant in the absence of substantial evidence.

In accordance with CEQA Guidelines section 15088.5(f)(1), the Carmel Unified School District (hereinafter referred to as “school district” or “District”) addressed the issues raised in the comment letters received during the public review period for the original draft EIR, in the revised draft EIR. The school district substantially revised the former draft EIR, and the RDEIR replaces the previous draft EIR in its entirety. Therefore, the comments received on the original draft EIR will not receive a response or be addressed in this final EIR. Only the public comments received during the 45-day public review period for the RDEIR are responded to and addressed in the final EIR.

CEQA Guidelines section 15088.5(f)(1) states, “When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the

revised EIR, that although part of the administrative record, the previous comments do not require a written response in the final EIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR.”

## Persons Commenting on the Revised Draft EIR

CEQA Guidelines section 15132(c) requires that the final EIR contain a list of persons, organizations, and public agencies that have commented on a draft EIR. A list of the correspondence received during the public review period for the revised draft EIR is presented in Section 2.2 below.

CEQA Guidelines sections 15132(b) and 15132(d) require that the final EIR contain the comments that raise significant environmental points in the review and consultation process, and written response to those comments be provided. A copy of each comment letter or other form of correspondence received during the public review period is provided. The number of each letter is included at the top of the first page of each letter. Numbers inserted along the margin of each comment letter identify individual comments for which a response is provided. Responses corresponding to the numbered comments are presented immediately following each letter.

Where required, revisions have been made to the text or graphics of the revised draft EIR. Comments that trigger changes to the revised draft EIR are so noted as part of the response. Revisions to the revised draft EIR are included in Section 3.0, Revisions to the Revised Draft EIR.

## 2.2 List of Commenters on the Revised Draft EIR and Responses to Comments

### Letters/Emails

The following written correspondence was received during the 45-day public review period for the revised draft EIR:

1. Geoff Johnston (4 letters/emails);
2. Melanie Trainor (3 letters/emails);
3. Dru Mattimore;
4. Kimberly Ratto;
5. Melodie Chrislock;
6. Valerie Hunken;
7. Ty Seeders;
8. Noelle Ballarini;

9. Renee & Scott Campbell;
10. Frances Dillard (9 letters/emails);
11. Robert Kahn (2 letters/emails);
12. Meredith Nole (2 letters/emails);
13. George Brehmer (3 letters/emails);
14. Bud Get (157 letters/emails);
15. Shel Lyons (2 letters/emails);
16. Tristan Mabry;
17. Lia and Herm Edwards;
18. Jana Lee (2 letters/emails);
19. David Vivolo (2 letters/emails);
20. Steve & Jiwon Chang;
21. Belle James (3 letters/emails);
22. Jane Goldcamp (7 letters/emails);
23. Patricia Roseburg;
24. Richard Dauphine;
25. Mary Surbridge;
26. James Lagiss;
27. Concerned Neighbor;
28. Thomas Cowen (2 letters/emails);
29. Meredith Stricker (2 letters/emails);
30. Ziona Goren;
31. Devie, Ron & William Tipton;
32. Diane Davies (2 letters/emails);
33. Lacey Haines;
34. Patti Long;
35. Janet McAthie;
36. Dean McAthie;
37. Margaret Dally;
38. Martha Douglass-Escobar;
39. Pat Sanders;

40. Mike Cate;
41. Angela Paxos;
42. James Realty;
43. Mark & Jennifer Carlson;
44. No Name;
45. Brent & Veronica Scott;
46. Mary Singer;
47. John Sinnhuber (2 letters/emails);
48. Darlene Berry;
49. Wendi Kirby;
50. Blase Mills (2 letters/emails);
51. Rochelle Bartholomew;
52. Philip Geiger;
53. Katie Heley;
54. Lindy Marrington (2 letters/emails);
55. Lisa van der Sluis;
56. Alos N. Attouh;
57. Zhenxing Wang;
58. Larry Arthur (3 letters/emails);
59. Conrad Ege;
60. Elizabeth Hills (2 letters/emails);
61. Steve Johnson;
62. Barry Kilzer;
63. Meredith Stricker & Thomas Cowen (2 letters/emails);
64. Will Chow;
65. Fevzi Karavelioglu;
66. Susan Love (3 letters/emails);
67. Melodie Chrislock & Phil Wellman;
68. Dr. Karyl Hall (2 letters/emails);
69. Patricia & James Kirshner;
70. Michael Lipscomb;

71. Jody Lyons;
72. RJC JRC (11 letters/emails);
73. Christy O'Connor (3 letters/emails);
74. Mal Schwartz (2 letters/emails);
75. Laura Tryon (3 letters/emails);
76. John Anderson;
77. Maria Anderson;
78. Robert Ballarini;
79. Dana Bambrace;
80. Lynn Berardo;
81. Christopher Bone;
82. Seth Busino;
83. Nancy Collins;
84. Molly Cybuck;
85. Jennifer Dianto Kemmerly;
86. Alec Duarte;
87. Brian Duarte;
88. Harriet Duarte;
89. Olivia Duarte;
90. Jeannie Ferrara;
91. Lauren Haase;
92. Diana Losch;
93. Don MacVicar;
94. Mary MacVicar (2 letters/emails);
95. Elsa Mead;
96. Allen Miller;
97. Susan Miller;
98. Noel Mills (2 letters/emails);
99. Allison & Rafael Mendez;
100. Amos Nachoum;
101. Hilmar Ockens;

102. Suzanne Ockens;
103. Kevin Pahler (2 letters/comments);
104. S. Sosna (2 letters/emails);
105. Martin Schwartz;
106. Yu-Chu Shen;
107. Rita Shugart;
108. Caesar Simon;
109. Christopher Smith;
110. Freya Smith (2 letters/emails);
111. John Swendseid;
112. Pamela Swenson (2 letters/emails);
113. Nancy Tuma;
114. Charlie Wahle (3 letters/emails);
115. Charles Bates;
116. Evagelia Paxos (2 letters/emails);
117. James Paxos (2 letters/emails);
118. Carole Rain (2 letters/emails);
119. Mary Rice (3 letters/emails);
120. Maria Sutherland (2 letters/emails);
121. Willam T. Roberts;
122. Saron Runde;
123. Robert Phelan (2 letters/emails);
124. Susan Roberts;
125. Martin Goldman;
126. Scott Highton (2 letters/emails);
127. Lindamarie Rosier;
128. Anne Sosna (2 letters/emails);
129. Memel Rosier;
130. Wallace Notley (2 letters/emails);
131. California Department of Fish and Wildlife;
132. Alexander Henson (2 letters/emails);



133. Jennifer Bradley;
134. Jana Brinsmead;
135. Jeannette Campbell;
136. Margaret Cantwell;
137. Eric & Elizabeth Mueller;
138. D. Poet;
139. Sherri Reid;
140. Louis Roberts;
141. Nancy Rawls Roberts (2 letters/emails);
142. K.R. Sawyer;
143. Jan Stine (3 letters/emails);
144. Megan Terry;
145. Paul Pomands;
146. Marguerite Meyer;
147. Audrey Morris (3 letters/emails);
148. Chris Allen (2 letters/emails);
149. Barbara Smith;
150. Marjorie Longo;
151. Mark & Jo Ann Holbrook;
152. Paola Berthoin (4 letters/emails);
153. Lucas Blok;
154. Margaret Butterfield;
155. Steve Ricks (2 letters/emails);
156. Donna Manning;
157. Emily Zefferman;
158. Sally Jewett-Brocato (2 letters/emails);
159. Concerned Carmel Residents (2 letters/emails);
160. Robert Hoag;
161. Angela Weigel;
162. Jim Suchan (2 letters/emails);
163. Judi Leavelle-King;

164. Trischa Tuesta (2 letters/emails);
165. Michael Heymann (3 letters/emails);
166. Peggy Licari (3 letters/emails);
167. William Gablin (3 letters/emails);
168. Vicki Sinnhuber (2 letters/emails);
169. David Allan (3 letters/emails);
170. Susan Wytyshyn;
171. Carol Pendergast;
172. Joe Longo;
173. Canyon Haverfield;
174. Mr. & Mrs. Dillard;
175. Don Hubbard;
176. Darrah Blanton;
177. Joe Krings;
178. Tucker Ramsay (2 letters/emails);
179. Maureen McEachen;
180. Nicholas Llewellyn;
181. John Krattli;
182. John McEachen (2 letters/emails);
183. Ralf Weigel;
184. Troy Ishikawa (2 letters/emails);
185. Tiffany Scarborough, Esq (2 letters/emails);
186. Laura;
187. Chad Calnon;
188. Leslie Turrini-Smith;
189. Elizabeth Woodard;
190. Tsengtseng Chang;
191. Mica Gross;
192. Alexis Delehanty;
193. Lauren Allen;
194. Save Carmel (9 letters/emails);

195. Jim Benya;
196. Belle Yang;
197. Aubrey Powers;
198. Valerie Bridges;
199. Jill Warner;
200. Edward Duggan; and
201. Deanna Edwards.

## Verbal Comments

Verbal comments were received on the revised draft EIR at a Special Meeting of the Board on Tuesday, September 6, 2022 at 5:30 P.M. in the Carmel Middle School Gymnasium from the following list of people. Responses to those verbal comments are addressed in Section 2.5, Verbal Comments on the Revised Draft EIR.

1. Bell James;
2. No Name;
3. Fran;
4. No Name;
5. Charles Wally;
6. Larry Arthur;
7. Susan;
8. No Name;
9. No Name;
10. No Name;
11. Jane O'Camp;
12. Will;
13. Susan Miller;
14. Alan Miller;
15. Jonathan Lyons;
16. Noelle Mills;
17. No Name;
18. No Name;
19. Marjorie;

20. Joanne Holbrook;
21. Tierra Teeves;
22. Noelle Ballerineri;
23. No Name;
24. No Name;
25. Maria;
26. No Name; and
27. Nina.

## 2.3 Written Comments on the Revised Draft EIR

Written comments on the draft EIR and responses to those comments are presented on the following pages.

From: **Geoff Johnston** <[tycojohn@aol.com](mailto:tycojohn@aol.com)>  
Date: Thu, Aug 25, 2022 at 6:48 PM Subject:  
Lights  
To: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>

1 | Think your approach is brilliant. Only change I would propose is that the new parking lot(s) will have lights for safety reasons. Lights that go on every evening from 6:00 to 9:00 to ensure that any students/staff working late have safe access to their vehicle.

Geoff Johnston

## Response to Letter 1a, Geoff Johnston

1. As described on page 4-21, the proposed parking lot at the location of the existing tennis courts, will be lighted. No new lights are proposed for the new parking area next to the pool. Existing pole lights and building lights provide sufficient illumination for this new parking area.



From: **Geoff Johnston** <[tycojohn@aol.com](mailto:tycojohn@aol.com)>  
Date: Thu, Aug 25, 2022 at 7:41 PM Subject:  
Re: Lights Oops Read Further  
To: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>

1 | Oops..read further and see you've included the parking lot lights. Geoff

## Response to Letter 1b, Geoff Johnston

1. See response to Letter 1a.

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From: **Geoff Johnston** <[tycojohn@aol.com](mailto:tycojohn@aol.com)>  
Date: Sun, Sep 4, 2022 at 3:57 PM Subject:  
Flyer in Our Mailbox  
To: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>

1 | The attached flyer was in the mailbox of all Carmel Views (and perhaps further) this weekend. Our HOA President sent an email that pointed out it is illegal to put flyers in mailboxes.  
Sorry for the marks on the scan. I was upset.  
"Improvements" is in italics.  
Apparently you are sneaky.

2 | The light pollution map on page 127 really does you no favor. My house is just a bit north of the middle school, down on Canada Drive in the canyon heading up from Carmel Valley Road. It would be impossible for me to see the lights as there is a ridge between me and the high school. Similarly, I think there are plenty of areas on the map where the lights might only be visible to the extent that a full moon was nearing the western horizon.  
As for light pollution, I am a bit confused. If it is dark out, those up the hill on Outlook Drive cannot see Point Lobos, where there are lights or not. 2/3rds of the year (roughly) the lights will not be on as the sun doesn't set until after all practices would be done. If the marine layer is in and the effects of the lights are magnified off the clouds...so what, the marine layer makes it impossible to see the coast with or without lights.

3 | And for the first time ever I know find that the high school's tennis court are "beloved".  
While removing the tennis courts doesn't solve the parking and traffic problems it is clearly a step in the direction of coming up with a permanent solution. And hardly "pork".  
While I agree kids need their sleep to excel in school. I also agree that kids need PRACTICE time to excel in athletics.

4 | Finally any consideration for mitigation at the Carmel Middle School only fundamentally moves the same issues from "their" neighborhood to someone else's neighborhood. But I guess those railing against the stadium lights would be perfectly happy with that.  
I'll be out of town on Tuesday. Good luck and have fun at the meeting.  
Geoff Johnston

# URGENT:

Special School Board Meeting on Stadium Lights & "Improvements"

Tuesday, September 6, 2022 at 5:30 P.M.

Carmel Middle School Gymnasium

CUSD HAS QUIETLY CHANGED PUBLISHED START TIME FROM 6:30 to 5:30 (Sneaky!)

We need your voice! CUSD is holding a Special Meeting on their proposed CHS Stadium Lights. It's urgent that we have neighbors and friends attend, stand up and be heard during this Meeting. CUSD Board Meeting will also be broadcast live at <https://www.youtube.com/c/CUSDBoardMeeting>.

Carmel area residents are currently reviewing the 394+ Page Revised Draft Environmental Impact Report (RDEIR) and preparing comments to deliver to the BOE – which can be found on [savecarmel.org](http://savecarmel.org) (sign the Petition please). **Here are key points to deliver at this Special Meeting:**

- **Significant and Unavoidable Light Pollution and Visual Impacts** even AFTER mitigation measures. See pg 35. Horrific Light Pollution captured on Map pg. 127.
  - \* Admits that county-designated "Highly Sensitive" areas like Point Lobos will be impacted.
  - \* Admits this would modify the "Visual Character and Quality of the Site" which puts protected Scenic State Highway 1, nearby Parks and neighborhoods in the impact zone.
- **RDEIR rips out** our beloved Tennis Courts for a new parking lot that doesn't solve the existing traffic and parking issues. This and adding a building and internal road construction is the Pork added to the Plan. CUSD didn't follow the CEQA process or file a Notice of Exemption for the Performing Art Center or the Swimming Pool and it's lights. CHS is a 22-acre campus. Stop this nonsensical over-building!
- **The RDEIR holds hostage** both the correction of the current swimming pool lights and the implementation of Late Start to the approval of the stadium lights. Stop the politics! Provide viable alternative solutions while protecting the environment – visual, audio and human.
  - \* Contain light pollution from the current Swimming Pool with Dark Sky certified lights.
  - \* Remove Late Start (a CA law), from the CEQA process (which is about construction) and implement Late Start. Our kids need their sleep to excel in school and athletics.
  - \* Properly assess the opportunity for growth at Carmel Middle School – a 60+ acre campus with more than 6 athletic fields already detailed in the CUSD 2019 Facility Master Plan.

**Thanks for attending and voicing your concerns.** This Special Meeting is your best and only opportunity to deliver specific & objective verbal comments about the RDEIR and Project concerns.

Please also **provide written comments before October 10, 2022 to** [feedback@carmelunified.org](mailto:feedback@carmelunified.org) or by mail: Carmel Unified School District, Attn: Dan Paul, Chief Operations Officer, 4380 Carmel Valley Road, Carmel, CA 93923. Comments must be objective and specific to the RDEIR and issues you'd like CUSD to address. Watch [savecarmel.org](http://savecarmel.org) for a customizable letter to make it easy to share your most impactful comments. A link to Revised Draft Environmental Impact Report (RDEIR) can be found at <https://drive.google.com/drive/folders/1FS0lhPjfOFFj8r42yi0rXZ2yOnY8KHUp>

## Response to Letter 1c, Geoff Johnston

1. This comment expresses concern regarding a flyer, which is attached to the comment, from those opposing the proposed project. This comment does not raise an environmental issue, and therefore, no response is necessary, as this Final EIR only addresses comments on the RDEIR.
2. Comment noted. This comment is regarding light pollution, which is addressed in Section 5.0, Aesthetics of the RDEIR.
3. Comment noted. This comment favors the new parking lot where the tennis courts are currently located. It does not raise an environmental issue and therefore, no response is necessary.
4. Comment noted. This comment is regarding the alternative of building a lighted stadium at Carmel Middle School. Alternatives are addressed in Section 18.0, Alternatives, of the RDEIR.

To Whom It May Concern:

1 Let me start with my background. We moved to Camel in 1994. We live 8/10ths of a mile from the high school as the crow flies. In the lower portion of the Carmel Views development about a half a mile from Carmel Valley Road. We have two boys who graduated from Carmel High in 2007 and 2010. Both played sports at Carmel High...the younger son playing football for four years. I was an assistant coach on the football team for nine seasons.

I would like to add my voice to the majority of people in the area who would like to see the infrastructure plan (including lights) implemented as soon as possible.

2 I am a strong supporter of SB 328 and later start times. However later start times mean that outdoor sports teams practicing in the afternoon will require lights to complete their practice sessions. Without lights, practices will start later (because of SB 328) and end when it gets dark...reducing practice time by 40%. That is a significant reduction which would certainly lead to teams being less prepared for athletic contests, and also likely increase the possibility of injury as student athletes have less time to get in shape.

3 As a parent of a football player (and as a coach) I also support the position that Friday Night Lights will likely be a strong contributor to increasing student school spirit and participation. One only has to attend a game at Gonzalez, Pacific Grove or Palma on a Friday night to see the number of students in the stands and the excitement that is palpable in the air.

4 Now let's address issues raised by those who do not want lights.

They suggest building a football stadium at the Middle School. In other words they are happy to have the lights as long as they are not in their neighborhood. It isn't light pollution that is their issue. It is that they don't want it in their neighborhood.

5 Parking is and has long been a problem at Carmel High. Every day of the school year or at large events whether a sporting event or a dance or parent/teacher night. Every step that can be taken to fix the parking problem is a smart step. While building a parking lot where the tennis courts are now will not permanently fix the parking issues, it is significant step in the right direction.

6 Do the neighbors use the tennis courts? Yes they do, but there are also courts at the Middle School that are less than 2 miles away. I'd advocate that the high school courts be used for parking AND that the district's infrastructure plan be amended to significantly upgrade the courts at the middle school.



7

Will the lights impact the State Highway scenic corridor? No for several reasons. First the lights will extend little (or perhaps not at all) above the trees on the west end of the field. Even after cutting down several of the trees to create a road, much of the light towers will be hidden by the remaining trees. Second, the scenic aspect of Highway 1 is to the west of the field. Coming down Highway 1 past the high school it would be hard to argue that there is any view that would be deemed scenic to the east of Highway 1. Third, the light towers have virtually zero impact (during the day) when seen from houses that are east of the football field. If you are a mile away and looking to the west, the light towers would appear no wider than a yellow pencil held down by your knee when viewed from 10 feet away. Frankly they would be hard to pick out among the trees on both ends of the football field. As for the night, you cannot forget that when it gets dark there is no such thing as a scenic view. It's dark. All you see are house lights, street lights and the like. The football field lights will be on during practice time until 7:00 pm (when people are eating dinner, not viewing) and 5 or 6 nights per year when there is a football game. Doesn't seem like destruction of the scenic corridor.

8

The argument that sound carries implies that sound does not carry on Saturday when games are played now.

9

80 foot lights may be double the height of the school's tallest building, however when you recognize that the north end of the campus is much higher than where the football field is, you realize that the light towers are not taller than the High School's Performing Arts Center.

10

Then they say that Carmel's character has been preserved for decades. But they seem perfectly happy to have the lights down at the Middle School. Last time I checked, the Middle School is considered a part of Carmel. Their complaints are not so much about no lights, no parking lot, etc. It is all about making sure those things are NOT in their neighborhood.

Respectfully,

Geoff Johnston

25505 Canada Drive

Carmel, CA 93923



## Response to Letter 1d, Geoff Johnston

1. This comment provides some background information regarding the commenter, but does not raise an environmental issue or specifically address the RDEIR. Therefore, no response is necessary.
2. Comment noted. This comment supports Late Start and adding lights for practice sessions. It does not raise an environmental issue and therefore, no response is necessary.
3. Comment noted. This comment supports Friday Night Lights. It does not raise an environmental issue and therefore, no response is necessary.
4. Comment noted. This comment is regarding the alternative of building a football stadium at Carmel Middle School. Alternatives are addressed in Section 18.0, Alternatives, of the RDEIR.
5. Comment noted. This comment is regarding the lack of adequate parking on campus, and supports adding parking. It does not raise an environmental issue and therefore, no response is necessary.
6. Comment noted. This comment is regarding the use of the tennis courts at the high school, advocates for the tennis courts to be used as parking, and advocates for the courts at the middle school to be upgraded. It does not raise an environmental issue and therefore, no response is necessary.
7. This comment is regarding lighting impacts from State Route 1 and removal of trees. The commenter advocates that the lighting impacts would not be significant. Lighting impacts are address in Section 5.0, Aesthetics, of the RDEIR, and the impact was determined to be significant and unavoidable. As discussed in the RDEIR, no trees are planned for removal; however, there is a possibility that trees may be impacted and therefore, need to be removed. This is addressed, with mitigation, in Section 7.0, Biological Resources.
8. Comment noted. This comment is about sound, which is addressed in Section 10.0, Noise.
9. Comment notes. This comment indicates that the proposed light “towers” would not be taller than the high school’s performing art enter because of topography. It does not raise an environmental issue and therefore, no response is necessary.
10. The commenter argues that those who oppose the project don’t want the lights at the high school but “seem perfectly happy to have the lights down at the Middle School.” Constructing a lighted stadium at the middle school is address in Section 18.0, Alternatives.

On Thu, Aug 25, 2022 at 8:36 AM Melanie Trainor <[trainor.mel@gmail.com](mailto:trainor.mel@gmail.com)> wrote:

1

I am opposed to the proposed stadium lights. I live a few blocks from the high school and am concerned about the light pollution, lack of sufficient parking, additional traffic, effect on certain types of birds, and noise.

Sent from my iPhone

## Response to Letter 2a, Melanie Trainor

1. This commenter is concerned about light pollution, lack of sufficient parking, additional traffic, effect on certain types of birds, and noise. Light pollution is addressed in Section 5.0, Aesthetics, in the RDEIR. The adequacy of a proposed project's parking is typically considered to be a social impact rather than an impact on the environment, and is not considered a potentially significant impact under the CEQA significance criteria. However, the proposed project includes 111 new parking spaces, which is discussed in Section 4.0, Project Description, as well as in Section 11.0, Transportation and Parking, of the RDEIR. Traffic impacts and proposed mitigation measures are likewise addressed in Section 11.0, Transportation and Parking. The commenter expresses concerns over potential effects on certain types of birds, but does not specify which types of birds are the subject of the commenter's concern. However, impacts on sensitive biological resources including nesting birds are addressed in Section 7.0, Biological Resources, of the RDEIR. Noise impacts are addressed in Section 10.0, Noise, of the RDEIR.

From: **Melanie Trainor** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> Date:  
Thu, Oct 6, 2022 at 6:55 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

- 1 1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
- 2 2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
- 3 3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
- 4 4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
- 5 5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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1

## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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2

## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqqyKOWRp60fDM\\_IrzgQMFtarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqyKOWRp60fDM_IrzgQMFtarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the

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scenic vistas and visual character of Carmel:

- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

- i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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3

### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

- i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

- ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely

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expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not



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perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwitAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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5

#### 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmljXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Melanie Trainor

[trainor.mel@gmail.com](mailto:trainor.mel@gmail.com)

25206 Flanders Drive

Carmel Drive, California 93923

## Response to Letter 2b, Melanie Trainor

This commenter summarizes five main concerns in the beginning of this comment email, and then follows with details regarding each concern. Each of the five concerns are responded to in the following five responses.

1. This comment is regarding the project objectives. Section 4.1, Project Objectives, of the RDEIR, presents the project objectives, which are required by CEQA Guidelines section, 15124(b). CEQA requires identification of objectives for the proposed project, not for the alternatives. However, the objectives help guide the selection of mitigation measures and alternatives to be evaluated in the EIR. The objectives describe the underlying purpose of the proposed project and provide a basis of identification of a reasonable range of alternatives evaluated in this RDEIR. A lead agency has broad discretion to formulate project objectives.

The commenter states that Objective 3, “provide the capability to host sport events and games for Carmel High School students in the evening when students, parents, and community members can more easily attend” is not based in fact, but does not provide evidence to the contrary. The history of sporting events at the high school indicates attendance at Friday night games is higher for all sports events. Both students and staff are more likely to attend as the events are within the confines of the school week. Saturday events require students and staff to give up a day of their weekend. The shoe game has higher attendance by Carmel students, staff and parents when it is held on Friday night at Pacific Grove High School as opposed to when the shoe game is held on Saturday at Carmel High School. Basketball games held Friday night have higher attendance whereas Saturday basketball games have traditionally had very low attendance.

Objective 4 is to improve athlete and spectator safety during evening sports events and games. The project accomplishes this by providing an additional 111 parking spaces on site, to discourage campus visitors from parking in the neighborhoods, a lighted pedestrian pathway, and facility lighting improvements.

Objective 8 is to implement “green building” practices that foster energy conservation, and replace outmoded athletic lighting fixtures (existing pool lights) with new fixtures that will obtain dark sky certification unrelated to the stadium lights. The replacement of the pool lights was added to the proposed project scope in response to public comments received during the public review period of the original DEIR. Although the replacement of the pool lights is part of the proposed project evaluated in the RDEIR, the District’s Governing Board has the discretion to approve replacing the pools lights, separately from consideration of the stadium lights if it so chooses. A decision on the project’s merits will be made by the District’s Governing Board. However, note that CEQA does not require an agency to

consider alternatives to a component of a project, and should instead focus on alternatives to the project as a whole (Calif. Native Plant Soc’y v. City of Santa Cruz (2009) 177 Cal.App.4th 957, 993.) No changes to the RDEIR are required.

2. This comment is regarding the visual assessment of the lights, and raises questions about a cost-benefit analysis, atmospheric moisture, the numbers of days lights would be on for games and practices, and mitigation measures.

**Cost-Benefit Analysis.** CEQA does not require a lead agency to conduct a cost-benefit analysis. CEQA does require lead agencies to adopt a statement of overriding considerations when approving a project with significant environmental impacts. CEQA Guidelines section 15093 states, “CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable.”

CEQA Guidelines section 15093(b) further provides: “When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.”

Additionally, CEQA Guidelines section 15093(c) states, in pertinent part: “If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination.”

The statement of overriding considerations is not required as part of a draft or final EIR, but it is required if, and when, a lead agency approves a project. No changes to the RDEIR are required.

**Visual Assessment of Lights.** The visual impact assessment of the proposed project, including the stadium lights, is presented in Section 5.0, Aesthetics, of the RDEIR. It does conclude that 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, and that this impact would be significant. Four mitigation measures were presented; however, the conclusion is that even with implementation of the mitigation measures, the lighting effect (light and glare and sky glow) would be significant and unavoidable.

The original DEIR evaluated lighting impacts from four key observation points. In response to public concerns about the lights affecting views as stated in comments received during the public comment period for the original DEIR, the district decided that the RDEIR should evaluate a much wider range of observation points, as requested in public comments. Several of those observation points were considered but were not included in the revised analysis. The methodology for the analysis is detailed in the section titled “Viewshed Analysis and Visual Simulations Methodology” beginning on page 5-15 of the RDEIR. Ultimately, five additional key observation points were used in the analysis, for a total of nine observation points, to simulate the visual impacts during both the day, and on a clear night, when the public is afforded unobstructed views. The analysis in the RDEIR does not conclude that the lights could only be seen from these nine locations; however, the impacts from these nine locations are representative of the impacts that can be experienced in the vicinity. CEQA does not require an evaluation of visual impacts from everywhere. CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure. Determining the significance of aesthetic impacts under CEQA is a qualitative judgment, not based on a set of quantifiable parameters. The district considered the comments from the public on the original DEIR and has made a good-faith effort at expanding the analysis and providing full disclosure in response to comments received. No changes to the RDEIR are required.

**Atmospheric Conditions.** Simulations were not conducted on cloudy or foggy nights. The commenter refers to lighting impacts in atmospheric conditions and provides links to two photos taken in December 2021 of the Carmel High School’s existing pool lights and the effect of sky glow in atmospheric conditions, possibly high fog or marine layer. The proposed light poles would include “Total Light Control for LED with BallTracker” technology, to track the football, lacrosse or soccer ball. The poles will have the ball tracker lights on a separate circuit so they will only be programmed to be on for football, lacrosse and soccer practices and games. This ball tracking light is the light that could cause sky glow. Lighting impacts, including sky glow, were determined to be significant and unavoidable in the RDEIR (Page 5-63). According to Daniel Lohman, Application Engineering Manager, with Musco Sports Lighting, LLC, although the marine layer and fog might be different, they look very similar. Either way, the concern appears to be sky glow since the commenter is likely concerned about the scattering of light particles to the interaction of the light particles with the air born water molecules. [Attached to this response, is an exhibit called “Lighting Aerial Sports Environmental Sensitivity.”](#) This exhibit shows what is called the Impact Factor for sky glow that is applied to light within certain angles above/below the horizon (0 degrees). Please note the Impact Factors shown are symmetrical about the horizon. The Impact Factor is a multiplier that explains how lighting within different zones impacts the perceived intensity of sky glow. The exhibit provides a good example for the critical 0-10-degree range.

Given the incredibly steep aiming angles for the proposed project lights, Daniel Lohman estimates that few, if not 0, lumens would be experienced in this critical zone. This means that while there will still be some sky glow impact from the lighting, it is expected to be very minimal.

The commenter also provides a link to comments provided on a different EIR for a project in another city, which is not relevant to the proposed project or the RDEIR. Therefore, no response to those comments is required.

No changes to the RDEIR are required.

**Number of Days Lights Would be on for Games and Practices.** The commenter expresses concern that the stadium lights will be on practically every day of the school year.

See Table 4-2, Proposed Schedule of Stadium Uses (After Installation of Field Lights). This table presents the starting and ending times of practices and games, some of which begin and end in the afternoon, some of which begin in the afternoon and end in the evening, and 4-6 which begin in the evening and end at 10 PM.

The last row of the table sums the number of practices 350-400 per year and sums the number of games/meets per year 74-124; however, mistakenly refers to all of the practices and games as “evening” games and practices. According to the Oxford Dictionary, the definition of evening is “the period of time at the end of the day, usually from about 6 p.m. to bedtime.” This terminology has been corrected in the text of the RDEIR, by deleting the word “evening.” See Section 3.0, Changes to the RDEIR, in this Final EIR.

Table 4-3, Proposed Stadium and Pool Facility Lighting Schedule, is presented on page 4-34 of the RDEIR. The table shows that the proposed stadium lights would be used approximately 147 days (including both practices and games) and that the length of time the lights would be on would range from about ½ hour to three hours, with a maximum of 3.5 to 5.5 hours for three games per year. Mitigation Measure 5-2a does restrict the number of games/meets played with a lighted field. An adding error was identified in this mitigation measure. The following games/meets were identified in the mitigation measure:

- 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).

These were correct. However, the paragraph in the Mitigation Measure following this list, totaled the game at forty-four (44). The correct number should have been sixty-eight (68). Additionally, the school district has since determined that track and field meets would not be played after dark when the lights are on. Therefore, they are removed from this mitigation measure and the total number will be corrected to sixty-four (64). This correction has been made in the RDEIR. See Section 3.0, Changes to the RDEIR, in this Final EIR.

The table also presents the anticipated number of days the pool facility lights would continue to be on after replacement of the existing pool facility lights. The number of days would not change based upon the replacement of the pool facility lights. However, there are other factors that can impact how long the lights are on. These are:

- Size and number of the water polo teams (there may be varsity, JV and freshman teams if there is enough participation) will dictate use of the pool. The number of participants in the 2022-23 school year required having the lights on until 8:15 pm. This can change year-to-year based upon how many students are choosing water polo.
- Late Start implementation may push the end of the school day later, which will affect the start and end of practice time for both water polo and swim.
- The sizes of the swim teams do not generally impact the length of practice. They share lanes and take over the deep end of the pool when dive practice ends; however, practice time may extend later in the evening due to Late Start implementation.

Replacement of the pool facility lights would reduce the lighting impacts from the pool facility. No changes to the RDEIR are required.

**Lighting Impact Mitigation Measures.** Four mitigation measures are presented in Section 5.0, Aesthetics, of the RDEIR, starting on page 5-62, and also included in the Summary. The details of the mitigation measures are provided in the RDEIR, and are summarized as follows:

Mitigation Measure 5-2a requires the district to prepare and adopt a policy limiting the number of night time games at the stadium and requiring the lights to be turned off by specific times for each type of event. The policy also requires lights to be turned off by 8:30 PM each night for practices.

Mitigation Measure 5-2b requires the district to prepare and adopt a policy that restricts use of the 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. Please note that the school district's definition of "non-school" groups, is any group or entity other than Carmel Unified School District, its schools, and programs. This has been clarified in the mitigation measure. See Section 3.0, Changes to the RDEIR, in this Final EIR.

Mitigation Measure 5-3c requires the district consult with an energy specialist regarding how to reduce the intensity of existing lighting at the campus that is visible off-campus, and to implement the specialist's recommendations.

Mitigation Measure 5-3d requires Dark Sky Certification for the replacement pool facility lights and the new stadium lights.

The commenter requests that the district not allow lights usage on weekends for any use. The district is not proposing to limit use of the field to specific days of the week for school activities to week days only. Such a prohibition would limit the district's ability to maintain parity in educational approach and would not meet the educational or administrative needs of the students or the district. Mitigation Measure 5-2a, however, above does not allow non-school related groups to use the facilities after dark.

The commenter requests that the lighting level be significantly reduced for practices. However, no reduced lighting standards exist for practices, and therefore, the lighting standards that are professionally recommended will be employed for both games and practices. Should these recommendations change, the district should consider modifying the lighting intensity for practices.

The commenter is concerned that school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for worse. Although school policies are subject to change by Board action, the district cannot eliminate mitigation measures once they are adopted. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments.

No changes to the RDEIR are required.

**Planting Trees as Mitigation Measures.** The commenter suggests planting trees to assist with mitigating the lighting impacts identified in the RDEIR. The district has considered this suggestion and agrees to prepare and implement a landscape plan associated with the proposed project. Therefore, the following mitigation measure is added to the RDEIR. Refer to Section 3.0, Changes to the RDEIR, of this final EIR.

5-2e. The district shall prepare and implement a landscape plan that will assist in softening the visual impacts of the project from State Route 1 to the extent feasible. The landscape plan will also include vegetation south and east of the stadium. The plan shall include, but not be limited to the following:

- a. Landscape screening and restoration shall consist of locally native plant and tree species consistent with surrounding native vegetation; and
- b. Trees and/or shrubs shall be included in the following areas to the extent feasible:



- i. Along the State Route 1 high school frontage in the vicinity of the stadium and new parking area;
- ii. South of the stadium and within and/or adjacent to the new parking area replacing the tennis courts;
- iii. East of the campus, including east of the new parking area near the pool, and east of the stadium; and
- iv. Trees planted east of the stadium shall be located at least 25 feet from the existing drainage in that area (see Figure 7-1 Habitat Map in the RDEIR).

The addition of this mitigation measure provides a minimal level of mitigation to the visual impacts of the proposed project and would not result in a new environmental impact. The visual impacts would remain significant and unavoidable. Other than the addition of this mitigation measure, no changes to the RDEIR are required to address this comment.

**Lighting Impacts at Wellesley HS.** The commenter provides a link to lighting recommendations for another high school, which is not relevant to the proposed project or the RDEIR. No further response is necessary as this Final EIR only addresses comments on the RDEIR. No changes to the RDEIR are required.

3. This comment is regarding noise and traffic impacts.

**Noise.** The commenter questions the data collected for the environmental noise assessment from a high school game in Visalia, California and provides web links to a noise analysis for Waunakee High School in Wisconsin, and a newsletter from the Council for Accreditation in Occupational Hearing Conservation, and states that multiple studies should have been used in the analysis.

Regarding the statement about the existing traffic noise levels already exceed the County's noise exposure standards, this statement has been deleted from the RDEIR, as it is incorrect. Deleting this statement does not change the analysis or the conclusions. See Section 3.0, Changes to the Revised Draft EIR, in this final EIR.

The noise levels described in the environmental noise assessment prepared by WJVA for the proposed project were based upon the best available information at the time the analysis was prepared, as the football games at Carmel High School had been cancelled due to the Covid-19 Pandemic school closures. However, WJVA conducted additional noise level measurements during a Carmel High School football game October 1, 2022 to confirm whether the data used from the Visalia high school game was adequate for the analysis. The supplemental noise analysis is included as [Appendix A to this final EIR](#). Noise levels were measured at numerous locations in the vicinity of the stadium and nearby residential uses in

the vicinity of the stadium. These measured noise levels were considered to validate the calculated noise levels provided in the original environmental noise assessment. In fact, the noise levels measured during the Carmel High School game football game were lower than those used from the Visalia game estimated in the environmental noise assessment. The dominant sources of noise were observed to be the referee whistles and the band performances. There will be no change to the PA system or football field configuration as part of the proposed project and it is therefore reasonable to assume that these measured noise levels will not increase with project implementation.

Regarding the noise evaluation terminology and metrics, there appears to be some confusion with the metrics applied. The “existing average noise levels” would be described in terms of the Leq metric (technically best described as the Equivalent Sound Level or Energy Average Sound Level). The numbers provided in this comment reflect the L90 statistical descriptor metric which is summarized in the environmental noise assessment, but does not reflect “average” noise levels, the Leq metric would be used for such. It is important to avoid comparisons of noise levels between various metrics (such as Leq, Lmax, Ldn/CNEL). Additionally, the range in noise levels provided in the comment (28.5 dB to 55.4 dB) account for an entire 24-hour measurement period. When comparing the noise levels associated with the football game to existing noise levels, it would be most accurate to compare the noise levels to existing ambient noise levels during the time window of which a game would occur (the 28.5 dB L90 described in the comment was measured at the 1:00 a.m. hour).

Regarding the recommended mitigation measures, CEQA requires application of mitigation only when an impact is determined to be significant. Certainly, existing use of the stadium (which is a baseline condition), as well as continued use of the stadium including evening-time use, results in noise. However, the environmental noise assessment evaluated the change in noise from additional spectators and the change from day time games to evening time games and concluded that the noise impact would not be significant and therefore, no mitigation was required (see pages 10-10 through 10-15 of the RDEIR). For reference, shielding using a product such as Acoustiblok (or any sound wall) would not be effective with this type of application. Sound barriers are most effective when the barrier is located either as close as possible to the noise source or the receiver, and generally needs to block line of sight between the two. Noise sources associated with football games at the stadium would come from various locations and heights above ground level. Additionally, the topographic difference between the stadium and the closest residential land uses already provides acoustic shielding, and there is generally no direct line of sight between the stadium noise sources and the residential land uses, with a few exceptions. Refer to Section 10.0, Noise, of the RDEIR for further discussion.

No changes to the RDEIR are necessary.

**Traffic and Parking.** The commenter expresses concerns regarding traffic and parking at high-attendance events. The most highly-attended events would be home football games, expected approximately three times per year. There are currently 276 parking spaces on site, and the proposed project includes an additional 111 spaces, for a total of 387 on-site parking spaces. The RDEIR acknowledges that 387 spaces would not be sufficient for the three anticipated high-attendance events per year, and a mitigation measure was included requiring implementation of a Traffic Management Plan, which is detailed in Mitigation Measure 11-4. In summary, the plan requires providing off-campus parking at Carmel Middle School and providing shuttles to and from the games, as well as encouraging modes of transportation other than automobiles, on-site traffic management and supervision, and off-site parking management. Implementation of the plan would ensure sufficient parking during high-attendance events. Refer to Section 11.0, Transportation and Parking, of the RDEIR for further discussion.

Hexagon Transportation Consultants (RDEIR Appendix J) reviewed the vicinity and on-campus access and circulation and concluded that with implementation of the Traffic Management Plan, traffic operations would work acceptably. Any perceived safety impacts would be mitigated by implementation of the Traffic Management Plan. Refer to Section 11.0, Transportation and Parking, of the RDEIR for further discussion.

The comment also presents a concern that, if parking is restricted in the neighborhoods east of State Route 1, overflow parking would now shift to parking in the neighborhoods west of State Route 1. It is important to note that parking in the neighborhoods is not prohibited, as the streets are public streets. Although with implementation of the Traffic Management Plan, there is no evidence that parking in the neighborhoods west of State Route 1 would occur with implementation of the Traffic Management Plan, the following measure shall be added to Mitigation Measure 11-4:

11-4g The district shall evaluate the Traffic Management Plan on an annual basis at the conclusion of football season if requested and provided with a concern regarding the plan's adequacy. This would include a review of, but not be limited to, parking issues that might occur in the neighborhoods west of State Route 1 if such concern is raised, and would likewise include, to the extent feasible, revisions to the Traffic Management Plan if deemed necessary by the district to address concerns raised.

Other than the addition of this mitigation measure, no changes to the RDEIR are required to address this comment.

4. This comment addresses regulations and ordinances.

**Cost-Benefit Analysis.** See response to comment 2 above.

**Protected Trees.** Potential impacts to the Monterey cypress along the western boundary of the project site associated with the 18-foot drive aisle, are addressed in Section 7.0, Biological Resources. Although the improvements are designed to avoid impacts to the trees, in the event damage occurs to any tree, the tree must be replaced in accordance with Mitigation Measure 7-6. Tree replacement is an acceptable and common mitigation measure in environmental analysis and the impact is less than significant. Replacement of trees damaged during construction is not inconsistent with any applicable regulation or ordinance. Moreover, as discussed below, the proposed project and the Carmel High School campus are exempt from local zoning ordinances and related regulations. See also the response to comment 2 above regarding landscaping. No other changes to the RDEIR are necessary.

**Consistency with Monterey County Policy.** The commenter also questions the proposed project's consistency with Monterey County's Greater Monterey Peninsula Area Plan's policy 3.3 regarding development next to a designated scenic route. The language of the policy is included in the RDEIR on page 5-12. The last paragraph acknowledges that exemptions are provided by Government Code section 54094, which allows the school district to exempt itself from the County's regulations. The school district has done so at its regularly scheduled Board Meeting on November 16, 2022 via Board Resolution No. 22-18.

Although the proposed project and Carmel High School campus are exempt from local zoning ordinances and regulations under Government Code section 54094, it is the school district's goal to comply with local regulations as much as feasible. Section 5.0, Aesthetics, acknowledges that the high school campus is located in a visually "sensitive" area. The high school campus is an existing development, which was constructed in 1939. Although the school district has exempted itself as allowed by state law, no structures are proposed within 100 feet of State Route 1. A proposed parking lot replacing tennis courts, and proposed access improvements are the only construction proposed within 100 feet of the highway, and this is within an area that is currently highly disturbed on an existing developed and operational high school campus. The proposed project is not inconsistent with this County policy.

**Lighting Impacts and Wildlife Species.** Regarding lighting impacts, please see response to comment 2 above. Regarding impacts to wildlife species, please refer to Section 7.0, Biological Resources, and Section 18.0, Alternatives, for a discussion of potential impacts to wildlife species. According to Section 7.0, Biological Resources, the proposed project would not have an impact on California red-legged frog or foothill yellow-legged frog, as there is no habitat for these species in the project vicinity (see page 7-18). Nesting birds and roosting bats do have the potential to be affected by construction of the project and mitigation measures are presented to reduce this potential, significant impact, to a less-than-significant level (see pages 7-27 through 7-32).

The RDEIR also addresses potential impacts to special status wildlife species of Alternative 4, which is construction of a lighted stadium at Carmel Middle School. The middle school is in the immediate vicinity of the Carmel River area, which contains habitat for California red-legged frog, California tiger salamander, and Monterey dusky-footed woodrat. Construction of a lighted stadium at the middle school does have the potential to result in impacts to these species (see pages 18-25 and 18-26).

The commenter also expresses concern about the stadium lights impacts wildlife species at Point Lobos (approximately two miles from the project site) and from Jack's Peak (approximately 1.5 miles from the project site). Because the proposed lights would not illuminate property beyond the high school campus boundary, including Point Lobos and Jack's Peak, the proposed project lights would have no impact on wildlife species at these two locations. Therefore, the proposed project would not violate the Endangered Species Act, or impact protected species at a state park or within the coastal zone. No changes to the RDEIR are necessary.

5. This comment addresses the Alternatives analysis.

**Sunshine Protection Act and Alternative 2.** Alternative 2 includes implementing the late start law without the proposed project. Alternative 2 is evaluated in Section 18.0, Alternatives, in the RDEIR. The commenter advocates for implementing the late start law without implementation of the project, because she believes that the Sunshine Protection Act will be passed.

The U.S. Congress passed S.623 - Sunshine Protection Act of 2021 – in March 2021, that would make daylight saving time permanent after the clocks spring forward in March 2023 and would set permanent standard time starting November 5, 2023. However, the measure has not yet passed in the U.S. House of Representatives, nor has it been signed into law by President Joe Biden. The CEQA Guidelines provide that the baseline environmental setting be used for gauging the changes to the environment that will be caused by the project. (14 Cal. Code Regs. §§ 15125(a) & 15126.2(a).) It would be speculative to predict if and when this measure would be enacted.

**Alternative 4, Lighted Stadium at Carmel Middle School.** The commenter expresses concerns about the number of homes that would be impacted by the proposed project compared to the number of homes that would be impacted by constructing the lighted stadium at Carmel Middle School. CEQA does not require a lead agency to consider the number of homes in an area of impact. The commenter has indicated that there are 152 homes within ¼ mile of the high school and 87 within ¼ mile of the middle school. These numbers have not been verified. While it may be true that there are more homes closer to the high school than the middle school, this information, if correct, does not render the environmental analysis in the RDEIR inadequate.

The commenter also provides maps showing the impact areas of lighting at the high school versus the middle school. However, there is no details or methodology or analysis of how these maps were prepared and therefore, its validity cannot be verified.

Is it acknowledged that constructing a lighted stadium at the middle school may impact fewer homes; however, this alternative would still result in a significant and unavoidable aesthetic impact from the lighted stadium, which could be more severe due to the existing lack of night time lighting at the middle school and the relative rural nature of the middle school. This alternative would also result in more severe impacts on other environmental resources including air quality, biological resources energy, cultural resources, and noise, all of which is analyzed and discussed in Section 18.0, Alternatives.

No changes to the RDEIR are required.

#### **Cost of Alternative 4 – Construction of a Lighted Stadium at Carmel Middle School.**

The commenter challenges the district’s estimate of \$72 million dollars to construct a lighted stadium at the middle school, implying that the existing middle school track and field could be used for the lighted stadium. However, the location of the existing middle school track and field is not located such that a lighted stadium could be constructed using the existing track and field facility only, without affecting other facilities. Construction of a high school stadium at the middle school would include several facilities, which are listed beginning on page 18-18 of the RDEIR. They are:

- All weather (artificial turf) field;
- All-weather track;
- Track and field event areas (shotput, discus, long jump, high jump, pole vault);
- Storage for all sports equipment;
- Scoreboard and sound system;
- Bleachers for both home and visitors;
- Pressbox;
- Locker room/team rooms;
- Restrooms for spectators and teams;
- Parking lot and associated lighting;
- Space for sports medicine staff and athlete treatment;
- Ticket booth and concessions area; and
- Field lighting.

Refer also to Figures 18-3 and 18-4 in the RDEIR, which presents the location of the existing track and field facility adjacent to Carmel Valley Road, and the 2019 facilities master plan for the middle school, which would require relocation of other athletic facilities.

No changes to the RDEIR are required.

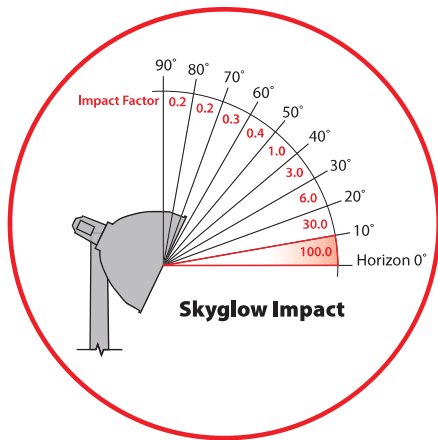
### Skyglow Impact

For more information see C. Walker, C. Luginbuhl, R. Wainscoat. (2009). *Lighting and Astronomy. Physics Today, Vol. 62, Issue 12*

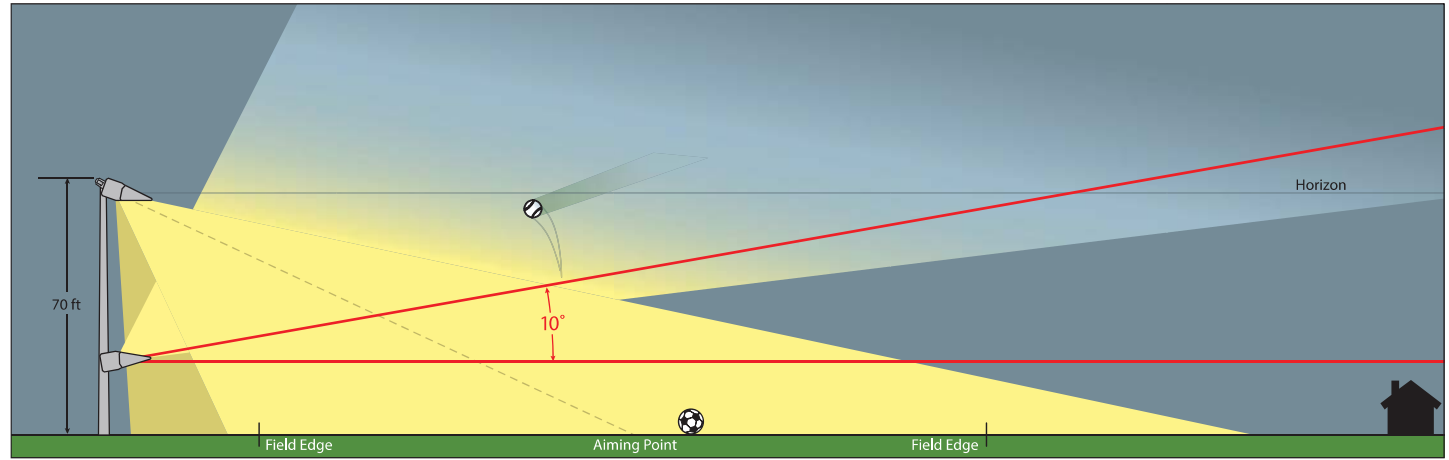
Skyglow is caused by upward light scattered by dust and molecules in the atmosphere.

Light emitted in a horizontal direction, at or above the horizon (0–10°) impacts skyglow by a factor of 100. It also travels through the atmosphere at greater distances.

Light emitted in a vertical direction, i.e. straight up, has a greater chance of escaping the atmosphere without scattering.

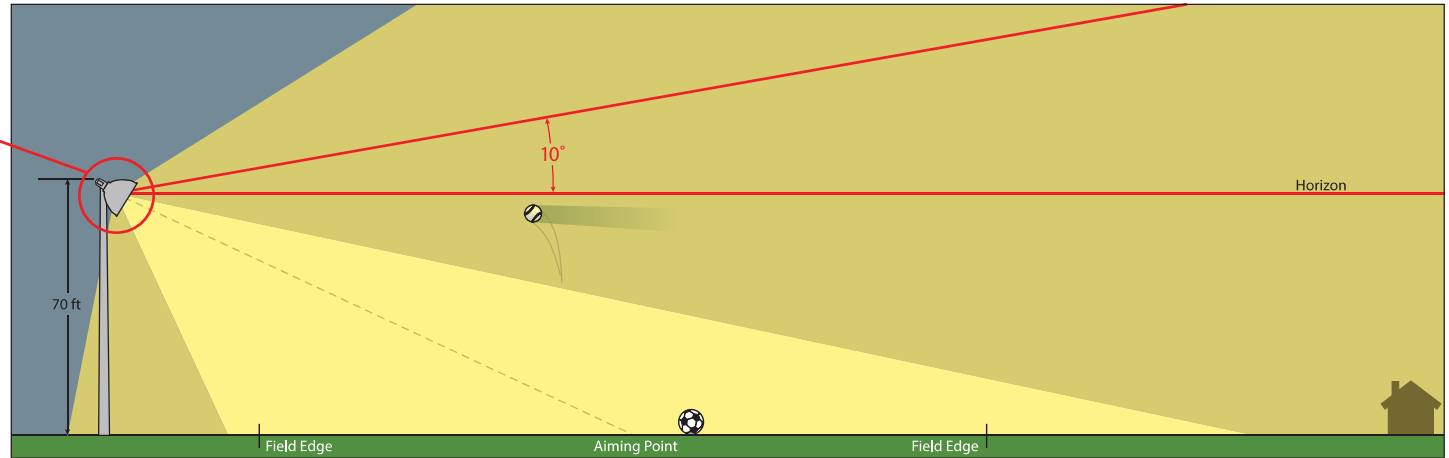


### Total Light Control — TLC for LED™ with BallTracker™ technology



- Very little light emitted in critical 0–10° angle above horizon
- Limited light emitted in an upward direction by one BallTracker fixture per pole
- Patents pending

### Typical HID or LED floodlighting



- All fixtures emit light in critical 0–10° angle above horizon, causing greater skyglow
- 400+% more skyglow than TLC for LED with BallTracker technology

### Light Intensity











**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

We have serious concerns regarding your Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

- 1 | **Show us the full impact of the light pollution on our treasured views and night skies.**
  - Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
  - Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.
- 2 | **Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**
  - Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
  - All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.
- 3 | **Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**
  - Re-start community engagement with a legally required Scoping Session.
  - There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
  - We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.
- 4 | **Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**
  - CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
  - CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
    - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
    - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
    - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
    - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.
- 5 | **Work with residents to protect their residential streets with permanent long-term No Parking Signs.**
  - The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
  - Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.
- 6 | **Show us the existing and proposed Emergency Access Routes. Are our kids safe?**
  - 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
  - From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.
- 7 | **You fail to identify noise during events as a significant impact despite evidence to the contrary?**
  - Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc
- 8 | **You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**
  - Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



- 9 **Provide full and consistent disclosure on how many practices and games the light will be on.**
- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
  - BUT the truth is on page 103 with up to 400 practices and 124 games.
  - Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.
- 10 **Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**
- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
  - Please include all the workstreams you promised during special sessions.
  - Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.
- 11 **Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**
- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
  - Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
  - Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?
- 12 **Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**
- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
  - Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.
- 13 **Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**
- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
    - *Updating required school area warning signage*
    - *Consider posted speed reductions down to 15 MPH in school areas*
    - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
    - *Exploring additional stop sign controls at intersection*
  - We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.
- 14 **Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**
- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
  - No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
  - No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
  - All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
  - Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.

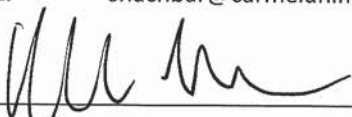


- 15 | **Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**
  - Install LED filters and use the lights as little as possible. Where is your usage policy?
  - In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.
- 16 | **Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**
  - There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
  - Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?
- 17 | **Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**
  - Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.
- 18 | **Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**
  - GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.
- 19 | **All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**
  - We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
  - Specify the exact nighttime you are simulating? Show us 9 PM.
  - What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?
- 20 | **Included detailed costs and budget breakdown associated with each of components of the project.**
  - If one of your stated objective is to meet school budget requirements, where are the costs estimates?
  - Please include a breakdown of all attorney fees associated with the stadium lights project.
- 21 | **Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**
  - Why do we only see Musco as a vendor and why is there only one design?
  - Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
  - What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?
- 22 | **CEQA requires Environmentally Superiority Alternatives. This is ours:**
  - Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
  - Implement "Green Building Lighting" on any existing fixtures on the campus
  - No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
  - No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
  - No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
  - Fast track Late Start outside of the CEQA process. It's not a construction project.
  - Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: 

DATE: 9/29/22

CONTACT INFORMATION: trainer.mel@gmail.com

## Response to Letter 2c, Melanie Trainor

1. The commenter is requesting additional visual impact analysis. See Letter 2b, response to comment 2.

Additionally, the commenter requests that story poles and/or balloons be installed to allow to see the height of the light poles and the visual impact during the day. A story pole is a length of narrow board usually cut to the building height of one story. It is used as a layout tool for any kind of repeated work in carpentry including stair-building, framing, timber framing, siding, brickwork, and setting tiles. They are often used to assist in the construction design process or may be required by a local agency prior to project approval. They help to represent the silhouette of a proposed structure or possible addition to an existing building. A story pole would not be appropriate for the proposed 80-foot light poles. While story poles may be appropriate to show the silhouette of a proposed building, it would not be appropriate for an 80-foot pole. Additionally, constructing an 80-foot pole to show the height of the four, proposed light poles would require approval from the State Department of the Architect. Raising a balloon 80 feet into the air, even if there was no breeze or wind of any kind, would not present the public with a realistic understanding of what the light poles would look like from various locations.

Section 5.0, Aesthetics, of the RDEIR includes visual simulations from nine locations, from as close as Morse Drive, 250-feet from the stadium (Figure 5-5b), to as far away as Carmel Meadows, 1.5 miles from the stadium (Figure 5-11b). These visual simulations provide the public with a realistic picture of what the proposed light poles will look like from those locations. Refer to Figures 5-2 to 5-11b in the RDEIR.

No changes to the RDEIR are required.

2. The commenter is requesting an analysis of the proposed project's impacts from several locations in the vicinity and region. Regarding visual impacts, see Letter 2b, response to comment 2.

Air quality impacts are addressed in Section 6.0, Air Quality; biological resources impacts are addressed in Section 7.0, Biological Resources; energy is addressed in Section 8.0, Energy; greenhouse gas emissions are addressed in Section 9.0, Greenhouse Gas Emissions; noise is addressed in Section 10.9; transportation and parking is addressed in Section 11.0, Transportation and Parking; soils, erosion, and water quality is addressed in Section 12.0, Soils, Erosion and Water Quality; and cumulative impacts are addressed in Section 15.0, Cumulative Impacts.

No changes to the RDEIR are required.

3. A scoping meeting was not legally required for the proposed project. However, the school district did hold a public scoping meeting on May 26, 2021 prior to preparation of the original draft EIR. The scope of the project was expanded to address and respond to public concerns raised during the 45-day public review period for the original draft EIR. The school district administration continued to communicate with the community regarding the decision to expand the project description and prepare a revised draft EIR.

Concept plans are often used in evaluating projects. The proposed project plans are detailed enough to evaluate the environmental impacts associated with the project, as presented in the RDEIR. No changes to the RDEIR are required.

4. The commenter expresses support for Alternative 4, construction of the lighted stadium at Carmel Middle School. This comment is noted, but no response is necessary.
5. The commenter expresses concern with the traffic management plan. The plan is only meant to be used when there are events at the schools where it is expected that on-campus parking would not be sufficient. It is not necessary to implement it on a permanent basis. No changes to the RDEIR are required.
6. There is no aspect of the proposed project, as mitigated, that would result in unsafe conditions at the high school. The commenter notes other improvements at the high school that are already constructed and are not a part of the proposed project. This Final EIR addresses comments on the RDEIR and does not apply to previous CEQA processes for other projects. No further response is necessary.
7. Regarding noise impact, see Letter 2b, response to comment 3. No changes to the RDEIR are required.
8. The proposed project does not include repairing the tennis courts. The proposed project includes removing the tennis courts and constructing a new parking lot. No changes to the RDEIR are required.
9. Regarding the number of days the lights would be on for games and practices, see Letter 2b, response to comment 2.
10. These comments are not regarding the environmental impacts of the proposed project or the RDEIR and therefore, no response is necessary.
11. Regarding parking capacity, see Section 11.0, Transportation and Parking, as well as Letter 2b, response to comment 3. Regarding high attendance games, many spectators stand or bring their own seats to the games (Dan Paul, Director of Facilities and Transportation, telephone conversation with consultant, June 15, 2021). Regarding emergency access routes,

ingress and egress, as well as internal circulation, for everyday or for emergencies is presented in Figure 4-1, Overall Site Plan, and Figure 4-6, Post Development Overall Parking Exhibit as well as response to Letter 14-2-f. No changes to the RDEIR are required.

12. Section 7.0, Biological Resources, accurately indicates that the proposed improvements have been designed to avoid trees removal. However, in the unintended event that a tree is damaged, replacement is required by Mitigation Measure 7-6 in the RDEIR. See also Letter 2b, response to comment 2. No changes to the RDEIR are required.
13. The commenter is asking why the school district has not already implemented the traffic management plan. The traffic management plan was prepared as a mitigation measure to the proposed project, which has not yet been considered by the District's Governing Board. However, in an effort to assist with the larger football games earlier in the season, school staff did implement some of the measures in the plan to assist with circulation and parking. A Safe Routes to School plan is not required for the proposed project. No changes to the RDEIR are required.
14. The commenter does not agree that the traffic management plan will work. See Letter 2b, response to comment 3. Regarding "vehicle occurrence," see Section 10.0, Transportation and Parking, in the RDEIR. Specifically, on page 11-10 of the RDEIR, nine other CEQA documents, in addition to the Mitty High School document, were reviewed addressing the number of persons per vehicle, to ensure that the 3.24 persons per vehicle was sufficient to use in the analysis. No changes to the RDEIR are required.
15. The proposed project includes replacing the existing pool lights with LED light fixtures.
16. Modifications to the baseball field are not included in the project description. However, regarding pedestrian access from the baseball parking lot, as shown in Figure 4-1 in Section 4.0, Project Description, of the RDEIR, a new four-foot sidewalk is planned to connect the existing baseball parking lot with the proposed tennis court parking lot off Morse Drive.
17. See response to comment 2 above.
18. The boundary between the high school and State Route 1 is marked by the existing wooden fence. See also the yellow dotted line in Figure 4.1, Overall Site Plan. See also Letter 2b, response to comment 4. No changes to the RDEIR are required.
19. The commenter requests to see photos from the various high points of light spill and requests a KOP simulation be prepared from where most of the stadium site is largely visible from the highway. As presented in Section 5.0, Aesthetics, of the RDEIR, light spill would not occur beyond the campus boundaries. As previously noted, the analysis in the RDEIR does not conclude that the lights could only be seen from the nine KOP locations;



however, the impacts from these nine locations are representative of the impacts that can be experienced in the vicinity. CEQA does not require an evaluation of visual impacts from everywhere. CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure. Determining the significance of aesthetic impacts under CEQA is a qualitative judgment, not a set of quantifiable parameters. The district considered the comments from the public on the original DEIR and has made a good-faith effort at expanding the analysis and providing full disclosure. No changes to the RDEIR are required.

The commenter requests to see RDEIR Figure 4-2c (Illumination Summary – Edge of Campus) extrapolated out until zero candelas is reached. A new figure - [Figure 4-2d Illumination Summary – Edge of Campus \(Foot-candles\)](#) - has been added to the RDEIR which presents lighting measurements as measured by foot-candles at the edge of campus. As noted in RDEIR Section 5.0, Aesthetics (page 5-61), horizontal foot-candle measurements were calculated at the field itself and the outside track as reflected in Figures 4-2a and Figure 4-2b of the RDEIR. Horizontal footcandle measurements range from a minimum of 42 foot-candles near the edges of the field to a maximum of 62 foot-candles located at along the northwest corner of the field surface. Foot-candle measurements disperse to 48 foot-candles (maximum) to one foot-candle (minimum) at the edge of the track. As shown in the new Figure 4-2d, horizontal foot-candle measurements at the edge of campus quickly disperse to a maximum of 0.02 foot-candles (directly south of the stadium near the property boundary with residences along Morse Drive) to zero foot-candles along the majority of the campus boundary.

It should be noted that horizontal foot-candles represent the amount of light being received on a horizontal surface and therefore are an appropriate unit of measurement for measuring brightness of lighting directly downward on a surface (i.e., the playing field or stadium seats). A candela is a measurement of luminous intensity or brightness as seen from a distance (i.e., from adjacent or neighboring properties). See Section 5.1 of the RDEIR under “Light and Glare” and “Lighting Fundamentals” for additional light and glare terms and definitions. Therefore, for purposes of the measurement figures prepared for the RDEIR, candela measurements were chosen for Figure 4-2c to reflect the level of brightness as seen from the edge of campus as opposed to foot-candle measurements measured at a horizontal surface level from the same approximate distance. According to the school’s lighting contractor, Musco Sports Lighting, candelas reflect a more accurate unit of lighting measurement (and potential light and glare impact) as seen from a distance (Bob Crookham, phone interview, August 15, 2022). However, for informational purposes, the additional figure (4-2d) has been included in the Final EIR to reflect the horizontal foot-candle measurements as seen from the edge of campus.

The commenter also requests clarification of the exact time that are reflected in the KOP simulations. The after dark photos were taken by 3DScape, the visual simulation consultant, at the following days and times:

- a. KOP 1 (April 2021 8:36 PM)
- b. KOP 2 (April 2021 8:16 PM)
- c. KOP 3 (April 2021 8:08 PM)
- d. KOP 4 (April 2021 8:42 PM)
- e. KOP 5 (June 2022 7:45 PM)
- f. KOP 6 (June 2022 7:41 PM)
- g. KOP 7 (June 2022 7:58 PM)
- h. KOP 8 (June 2022 8:29 PM)
- i. KOP 9 (June 2022 8:18 PM)

No changes to the RDEIR are necessary.

20. Attorney's fees and itemized costs are outside the scope of the RDEIR and the CEQA process. This comment does not raise an environmental issue and therefore, no response is necessary.
21. Competitive bidding processes are outside the scope of the RDEIR and the CEQA process. This comment does not raise an environmental issue and therefore, no response is necessary.
22. The comment proposes an additional project alternative and the commenter expresses their support for fixing the pool lights, implementing "Green Building Lighting" on existing lighting fixtures on campus, fast tracking Late Start (without implementation of the proposed project), and assessing growth at Carmel Middle School. The commenter expresses their opposition to the stadium lights, the viewing platform and storage building, and the improved internal circulation system to the new parking lot. The comment does not raise new environmental issues and therefore, no response it necessary.

No set number of alternatives is necessary to constitute a legally adequate range of alternatives, and the district, as the lead agency, has the discretion to determine how many alternatives will constitute a reasonable range. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 566.) As stated in Section 15126.6 of the CEQA Guidelines, "An EIR need not consider every conceivable alternative to the project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible... There is no ironclad rule governing the nature or scope of the alternatives to be

discussed other than the rule of reason.” Likewise, CEQA does not require that an agency consider alternatives to a component of a project, and should instead focus on alternatives to the project as a whole (Calif. Native Plant Soc’y v. City of Santa Cruz (2009) 177 Cal.App.4th 957, 993.)

On Wed, Aug 31, 2022 at 7:55 AM D. Mattimoe <[amattimoe@gmail.com](mailto:amattimoe@gmail.com)> wrote:

Hello!!!

I'm a former Padre Parent.

My husband And I chaired Sober Grad in 2016 and I live behind the high school on Whitman Circle.

I am 100% in favor of your project as long as the stadium lights get turned off at a reasonable hour.

Last weekend there were signs all over Flanders telling people not to park on our streets for the Shoe Game. That's ridiculous and unfair. I have no problem with people parking there to see games but I'm hoping your 111 new parking spots will offset such a need.

Good Luck,  
Dru Mattimoe

Sent from my iPhone

### Response to Letter 3, Dru Mattimore

1. Comment noted. The commenter expresses support for the proposed project, but does not comment on the RDEIR. Therefore, no response is necessary.

On Sat, Sep 3, 2022 at 5:56 AM Kimberly Clark Ratto <[kim\\_c@me.com](mailto:kim_c@me.com)> wrote:

To Whom it May Concern:

1

The light pollution from this proposed project will have such negative and longstanding consequences for the entire community, impacting all of our lives. It strikes at the very core of why we all painstakingly and sacrificially have chosen to live here- because of the sacredness of it's natural beauty. Once you disregard and disrespect the preciousness of that asset then it is gone forever. This isn't a direction in anyone's best interest.

Please be accountable and responsible with the leadership position that you have been given and preserve the integrity of this beautiful place. It's all we have left.

My Sincere Concern,  
Kimberly Ratto

Sent from my iPhone

## Response to Letter 4, Kimberly Ratto

1. The commenter expresses concern regarding light pollution associated with the proposed project. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR.

From: [mwchrislock@redshift.com](mailto:mwchrislock@redshift.com) <[mwchrislock@redshift.com](mailto:mwchrislock@redshift.com)>

Date: Sat, Sep 3, 2022 at 8:26 AM

Subject: Proposed Stadium Lights at Carmel High School

To: <[dpaul@carmelunified.org](mailto:dpaul@carmelunified.org)>, <[poulter@emcplanning.com](mailto:poulter@emcplanning.com)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

1 | As a concerned resident of Hatton Fields, I do not support the installation of the new stadium lights. The Draft EIR that the School Board commissioned does not adequately address the cumulative impacts of parking, traffic safety, environmental habitat, greenhouse energy, light and noise impacts that would directly impact our neighborhood. We ask that each of the areas above be resolved.

Please address the effect of these lights and the noise created by these crowds on the people who live nearby:

2 | • We'd like to see a Fixture Seal of Approval Program certifying outdoor lighting fixtures as being Dark Sky Friendly. We'd like to see similar green certification on the expended energy these lights require.

3 | • Please provide impacts of both light pollution and noise affecting both humans and nocturnal wildlife.



4

Similar to the ongoing lawsuit which opposes stadium lights at MPUSD, we do not feel this CHS project's Draft EIR adequately satisfies compliance with the California Environmental Quality Act. You have received a neighborhood petition of more than 100 signatures indicating the Carmel Unified School District must address our concerns. You should take seriously that we will galvanize for legal compliance with the CEQA, requiring you to adequately identify, evaluate and determine the significance of any potential environmental impacts of proposed stadium lights.

Impacts on the environment are deemed significant if they pose a potentially substantial adverse change to the physical conditions within the area affected by the project. I believe your proposed lighting project to facilitate night-time events within our peaceful neighborhood is unnecessary and contrary to our mutual interests of a healthy environment for our students and neighboring residents.

5

Parking/Traffic Safety/Speeding:

We need a more specific mitigation plan for the already insufficient CHS parking, its overflow of traffic and its resultant safety issues, to be worsened upon unlit streets for planned night-time events. Options:

- Current neighborhood No Parking signs only restrict parking from 7:00 a.m. until noon M-F. We want them to address night events. A "Residents Only" sign needs to be approved for the spillover streets. You also need to outline specific CHIP traffic enforcement of the signage during the night events.
- Fire and Emergency vehicle access in during event street congestion is not being fully addressed.

6

The Draft EIR, Section 3.0 states an average doubling of current event attendance, with up to 2,000 attendees likely, which is far beyond CHS grounds capacity for parking (201 spaces) and sets up a real hazard for entering and leaving the campus and neighborhood streets.

6  
con't.

- How were the increase projections estimated? We believe they are low. We would like to see the existing stats of the other schools and estimations of game attendance from MPC and PGHS that might be coming to Carmel High if these stadium lights are installed. What is their comparative parking to attendance ratio?
- We'd like you to formally request to MPC and PGHS that Carmel High use their fields as alternative venues and fully explain why they are not solid alternatives (also not addressed in the Draft EIR).

7

We would like additional measures of maintaining speed controls. The 25 miles per hour signs are already not working well for student vehicular traffic. We'd like you to implement a Neighborhood Traffic Management Program (NTMP). A similar program was adopted in Salinas under Measure X, Traffic Calming Program.

Melodie Chrislock  
26235 Atherton Place  
Carmel, Ca 93923

## Response to Letter 5, Melodie Chrislock

1. This comment states a general concern regarding cumulative impacts in the areas of parking, traffic safety, environmental habitat, “greenhouse energy,” light, and noise impacts on the neighborhood. Cumulative impacts are addressed in Section 15.0, Cumulative Impacts, of the RDEIR.

Additionally, the comment requests that the effect of lights and noise created by crowds on the people living nearby be addressed. Noise impacts on humans is addressed in Section 10.0, Noise, of the RDEIR, and lights and visual impacts are addressed in Section 5.0 Aesthetics, of the RDEIR. Please also refer to response to comment 3, below. No changes to the RDEIR are required.

2. As discussed in Section 4.0, Project Description, and in Section 5.0, Aesthetics, the school district submitted the proposed stadium lighting design for Dark Sky certification and received design analysis (Phase I) approval from the International Dark-Sky Association (IDA) on October 27, 2021. The LED light pool light fixture designs were also submitted to the IDA and received design analysis approval for Dark Sky certification on July 29, 2022. The Lighting Performance Summary Results provided by IDA in evaluating the proposed stadium lighting and pool lighting designs are included as Appendix D of the RDEIR. No changes to the RDEIR are required.
3. This comment is about light pollution and noise affecting both humans and nocturnal wildlife. Noise impacts on humans is addressed in Section 10.0, Noise, and noise and lighting impacts on wildlife are addressed in Section 7.0, Biological Resources.

Regarding lighting impacts on humans, Harvard Health documents what blue light is and the effect blue light has on your sleep and more ([www.health.harvard.edu/staying-healthy/blue-light-has-a-dark-side](http://www.health.harvard.edu/staying-healthy/blue-light-has-a-dark-side)). According to this article, although it is environmentally friendly, direct exposure to blue light before bed can affect sleep and potentially cause disease. Until the advent of artificial lighting, the sun was the major source of lighting, and people spent their evenings in (relative) darkness. Now, in much of the world, evenings are illuminated, and we take our easy access to all those lumens pretty much for granted. At night, light throws the body's biological clock—the circadian rhythm—out of whack. Sleep suffers. Worse, research shows that lack of sleep may contribute to the causation of cancer, diabetes, heart disease, and obesity.

Not all colors of light have the same effect. Blue wavelengths—which are beneficial during daylight hours because they boost attention, reaction times, and mood—seem to be the most disruptive at night. And the proliferation of electronics with screens, as well as energy-efficient lighting, is increasing our exposure to blue wavelengths, especially after sundown.

Everyone has slightly different circadian rhythms, but the average length is 24 and one-quarter hours. The circadian rhythm of people who stay up late is slightly longer, while the rhythms of earlier birds fall short of 24 hours. Dr. Charles Czeisler of Harvard Medical School showed, in 1981, that daylight keeps a person's internal clock aligned with the environment. Some studies suggest a link between exposure to light at night, such as working the night shift, to diabetes, heart disease, and obesity. That's not proof that nighttime light exposure causes these conditions; nor is it clear why it could be bad for us.

Due to the extreme cutoff light design proposed, Musco Sports Lighting anticipates little to no light trespass and glare occurring from either the stadium or pool retrofit lights. This means that people outside of the immediate environs of the pool and/or stadium would have little to no exposure to the light effects (Daniel Lohman, Musco Sports Lighting, e-mail message to school district, October 17, 2022). Athletes and spectators at the sporting events would not be affected by the lights, since they are not (hopefully) attempting to sleep through the events. Therefore, the proposed project would not have a lighting impact on people's ability to sleep and therefore, their health.

4. This comment is about a lawsuit associated with another project and different school district, states that a group will galvanize for legal compliance, and that the district is required to adequately identify, evaluate and determine the significant of any potential environmental impact of proposed stadium lights. Moreover, light impacts area addressed in Section 5.0, Aesthetics, of the RDEIR. The comment does not specify how the RDEIR is inadequate. Therefore, no further response is necessary, and no changes to the RDEIR are required.
5. This comment is regarding the existing parking restrictions in the neighborhood and requests "residents only" parking signs in the neighborhood. Permanent parking signage and parking on local streets is governed by the County of Monterey, and are not under the control of Carmel Unified School District. However, the project aims to reduce parking on local streets by encouraging alternative modes to and from campus, and providing additional parking and loading spaces on campus. Specifically, traffic and parking area addressed in Section 11.0, Transportation and Parking, of the RDEIR. The RDEIR concludes that, even with the addition of 111 parking spaces on campus, for the most highly attended events, parking would not be sufficient. Mitigation measure 11-4 requires preparation and implementation of a detailed traffic management plan. With implementation of this plan, parking during the most highly attended events would not result in a significant environmental impact or emergency access issues. No changes to the RDEIR are required.
6. This comment is about the projected increase in attendance at games that would occur after dark. Projected attendance is based upon the experience of the school's athletic department faculty, and is discussed in detail in Section 4.0, Project Description, pages 4-34 and 4-35, and summarized in Table 4-4.

The commenter also expresses concern parking capacity at Carmel High School, and references 201 parking spaces, however it is unclear where this parking count is from. There are currently 276 parking spaces on site, and the proposed project includes an additional 111 spaces, for a total of 387 on-site parking spaces. Please refer to Table 3-5 and Table 4-1 in the RDEIR. Please also refer to the discussion of parking in Section 11.0, Transportation and Parking, of the RDEIR.

The commenter also expresses concerns that Monterey Peninsula College and Pacific Grove High School games would be played at Carmel High School if the lights are installed. Both of these schools have their own lighted fields and there would be no reason for them to use Carmel High School for their games.

Finally, the use of Monterey Peninsula College and Pacific Grove High School lighted fields is included an alternative to the proposed project. See Section 18.0, Alternatives, in the RDEIR regarding the discussion and evaluation of Alternative 3. No changes to the RDEIR are required.

7. The commenter asks for changes to the speed limit in the neighborhood. The school district has no authority regarding speed limits on the public roadways. This is the responsibility of the County of Monterey. No changes to the RDEIR are required.

On Sat, Sep 3, 2022 at 5:40 PM Valerie Hunken <[vhunken@comcast.net](mailto:vhunken@comcast.net)> wrote:

1

Hello,

I would like to send CHS my complete support for the stadium lights.

Valerie Hunken

Sent from my iPad

## Response to Letter 6, Valerie Hunken

1. Comment noted. The commenter expresses support for the project, but does not raise an environmental issue. Therefore, no response is necessary.

**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

We have serious concerns regarding **your** Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



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con't.

**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - *Updating required school area warning signage*
  - *Consider posted speed reductions down to 15 MPH in school areas*
  - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
  - *Exploring additional stop sign controls at intersection*
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.

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con't.

**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Ty Seeders (Ty Seeders)

DATE: Oct 2, 2022

CONTACT INFORMATION: trampa25@hotmail.com

## Response to Letter 7, Ty Seeders

1. See response to Letter 2c.

On Tue, Sep 6, 2022 at 10:17 PM Noelle & Bob Ballarini <[the.ballarinis@gmail.com](mailto:the.ballarinis@gmail.com)> wrote:  
I attended the meeting on September 6th and would like to add my comments in writing for the record.

1 **Our family moved away from a more urban area 12 years ago to live in this beautiful place. We moved away from a place where a nearby business blasted lights at night in their parking lot and ran announcements on an outdoor speaker. It disturbed us on a daily basis.**

**We felt very fortunate to find a house in Carmel Hills where we have Mountain views and beautiful starry skies. Finally, we felt that we found a place that respected nature and cherished it! In the evening , when Hwy 1 is finally calm, you hear owls and nocturnal animals. The nature here is so important and will be irreversibly damaged by these plans. My son goes to Carmel high so I am pro-school, but not pro-competitive sports that override all else. Plus, the plan**

**for the tennis courts to be ripped out? What! We have played many weekend family tennis games on the CHS courts. It's so nice to have this access in the community. I don't think a replacement parking lot will have the same "family fun" benefit. In short, am definitely not anti-athletics and appreciate school pride etc. but NOT at the DETRIMENT of the community. It's just flat out inconsiderate to others.**

**We happened to be at home during the recent "shoe" football game on an otherwise calm and lovely Saturday afternoon. We could hear the whole game from our house, as if we were there. We heard the roar of the crowd as it rose and fell for every play; all its high points and low points. It was a very emotional and pervasive event that we weren't even attending, but the noise was pumped right into our house. I was so glad when the game was finally over. The idea that this would start happening regularly at night, not just for football practices/games, and whatever else, is appalling. My husband**



**and I work really hard every day to be able to afford to live here. When we finally are off work, we want to quietly relax in our home! Your plans will affect so many people and ruin the existing peace in their own homes. It might benefit the members who are pushing for these “improvements” to have an outside hook up of mega tv screen blasting football, or even better, a really loud event that they are not “passionate” about poignantly directed at their own homes every evening. Mind you, someone else would be controlling the remote! Another analogy: if you had a neighbor who threw a raging party every weekend, you would you grow angrier and angrier as they continued to disrespect their neighbors’ complaints. This situation is very much the same. Stop the ever growing CHS sports “above all” agenda and forcing your neighbors to pay the real price!**

**Noelle Ballarini**

## Response to Letter 8, Noelle Ballarini

1. The commenter expresses concerns regarding existing and future noise associated with high school events. Noise is addressed in Section 10.0, Noise, of the RDEIR. This comment also raises concern over the recent shoe game, which is a baseline condition.

Additionally, this comment expresses opposition to the demolition of the tennis courts and replacement parking lot. but does not raise an environmental issue.

1 | On Tue, Sep 6, 2022 at 11:20 PM Renee Campbell <[outlookrenee@yahoo.com](mailto:outlookrenee@yahoo.com)> wrote:

We fully support lights at CHS. We need to support our local high school and our kids.

Renee and Scott Campbell  
Carmel Views

[Sent from Yahoo Mail for iPhone](#)



## Response to Letter 9, Renee & Scott Campbell

1. Comment noted. The commenter expresses support for the project, but does not raise an environmental issue. Therefore, no response is necessary.

On Sep 15, 2022, at 9:07 AM, Frances Dillard <[dillardfran@gmail.com](mailto:dillardfran@gmail.com)> wrote:

1 | We certainly understand there is a School Board "judgement" call when it comes  
to CEQA: [Can it be said with certainty that there is no possibility that the activity  
could have a significant or even potentially significant effect on the environment.](#)

2 | But, it is that board judgement call that the community is calling into question and  
on multiple projects from the Performing Art Center, Swimming Pool, Batting  
Cages, Improvements on the Fields. The board has consistently ignored the rigour  
of a CEQA process, and has hush hushed the Notice of Exemption (no signatures,  
filings), etc. The community has never been given the opportunity to participate  
and voice our concerns of ever-expanding construction projects on a limited  
campus size. We walk the neighborhood on many occasions when baseball games  
are happening and that entire gated access is filled with cars parked illegally to  
block emergency vehicle access. Even without parked cars, if a true CEQA  
process was followed when installing the batting cages, my sense is that the high  
risks of emergency vehicles being unable to access the fields fast enough down  
the narrow lane would have been discovered.

3 | Perhaps I'm wrong - but we find it too coincidental when we are bringing up  
Emergency Vehicle Access, that CUSD is just happens to conduct a partial  
boundary survey on a narrow lane. I do think it's the Board's Responsibility to  
hold the Superintendent and Facilities accountable for student safety. In the  
corporate world, someone would certainly be fired if they are aware of safety  
violations that have been present for years and are now moving towards a "clean-  
up" or "cover-up".

We are talking about the basic fundamentals of student safety. We can't  
emphasize enough that any further development on the 22-acre campus  
(especially at night) is going to introduce madness with traffic and safety risks.

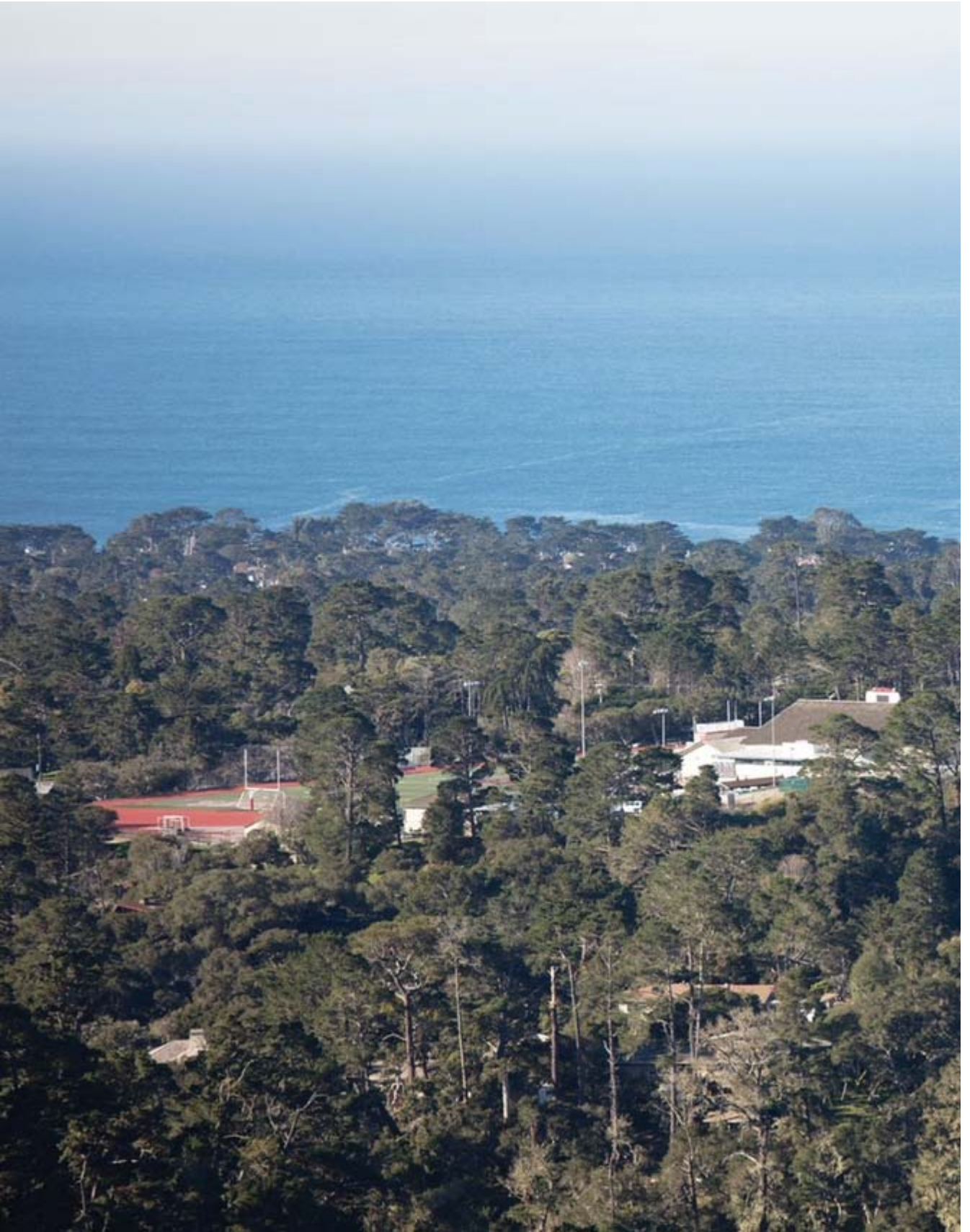
## Response to letter 10a, Frances Dillard

1. The proposed project will result in significant unavoidable visual impacts associated with proposed lighting. Please refer to this discussion in Section 5.0, Aesthetics, of the RDEIR. All other significant impacts can be mitigated to a less-than-significant level. Please see Table 2-1 in the RDEIR, and related discussion throughout. Under CEQA, the school board does not need to make a finding that with certainty there is no possibility that the activity could have a significant or even potentially significant effect on the environment.
2. This comment is about existing conditions and past projects. Past projects are not the subject of the RDEIR. This comment is not about the proposed project or the analysis in the RDEIR; therefore, no response is necessary. This final EIR addresses comments on the RDEIR and does not apply to previous CEQA processes for other projects.
3. The commenter provides her opinion about existing emergency vehicle access conditions, and questions traffic and safety risks with further development on the campus. Traffic and safety associated with the proposed project are addressed in Section 11.0, Transportation and Parking, in the RDEIR.

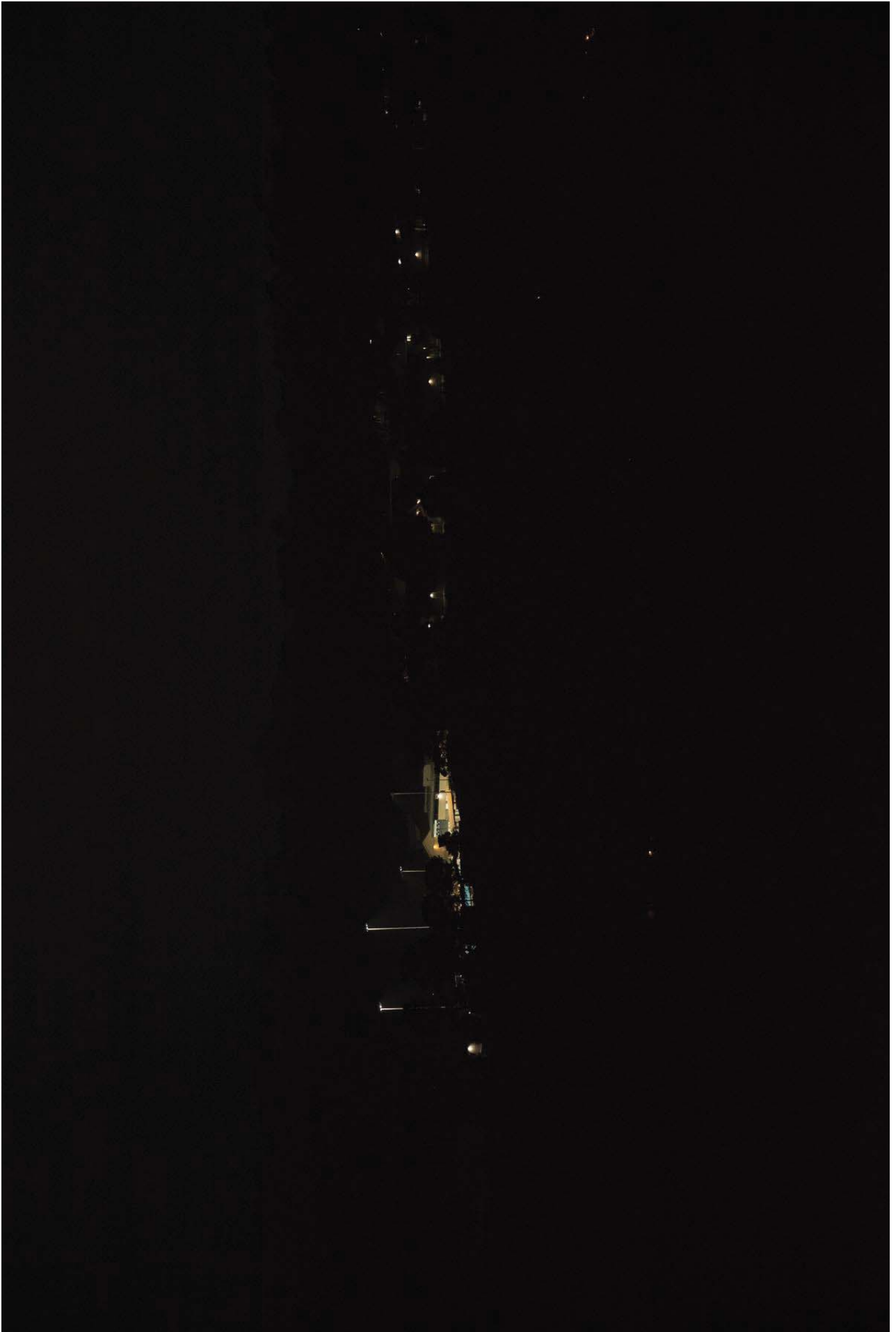
On Wed, Sep 21, 2022 at 7:08 AM Frances Dillard <[dillardfran@gmail.com](mailto:dillardfran@gmail.com)> wrote:

- 1 | All of your KOP Photos in the RDEIR are not accurate or are shown at the lowest level of environmental impact.
  - What time are you simulating at night?
  - Can we see photos taken more clearly during the day and at the HIGHEST level of environmental impact at night (more like 9:30 PM) when you indicate games will still be occurring. Also from the locations where the highest level of candelas will be seen.
  
- 2 | Truly the saddest accurate photos are the truth of what we see when we walk around the Carmel Views public spaces. How horrific (see below) we aren't fixing this ASAP as promised?
  
- 3 | The light pollution can decrease from 80,000 candelas to 341 candelas with LED lights (page 171). Why are we waiting to fix and holding this hostage to the stadium lights?
  - Please put these photos as part of the public record of more accurate photos that show the negative impact to the environment .
  - Thanks for polluting our community and now, not picking up your litter ASAP.

3  
con't.



3  
con't.



## Response to Letter 10b, Frances Dillard

1. The after dark photos were taken the following days and times:
  - a. KOP 1 (April 2021 8:36 PM)
  - b. KOP 2 (April 2021 8:16 PM)
  - c. KOP 3 (April 2021 8:08 PM)
  - d. KOP 4 (April 2021 8:42 PM)
  - e. KOP 5 (June 2022 7:45 PM)
  - f. KOP 6 (June 2022 7:41 PM)
  - g. KOP 7 (June 2022 7:58 PM)
  - h. KOP 8 (June 2022 8:29 PM)
  - i. KOP 9 (June 2022 8:18 PM)

The after dark photos and simulations accurately present the lighting and glare impacts associated with the project, from a variety of locations, some of which include public areas with a high level of candelas (refer to Figure 4-2c in the RDEIR). Regarding the candela measurements, see also response to Letter 2c, comment 19. The RDEIR concludes that the visual impact associated with light and glare is significant and, even with the implementation of mitigation measures presented in the RDEIR, the impact remains significant and is unavoidable if the project is implemented. It is not necessary to take new photos and revise the simulations. No changes to the RDEIR are required.

The eight locations from which photos were taken during the day are representative of the day time visual impacts of the proposed light poles. CEQA does not require an analysis from every conceivable location. No changes to the RDEIR are required.

2. This comment is regarding some existing conditions, and does not raise an environmental impact regarding the proposed project. Therefore, no response is necessary.
3. This comment is regarding the existing pool lights. Replacement of the pool lights is included in the project description and was added to the proposed project scope in response to public comments received during the public review period of the original DEIR. The school district is not holding replacement of the pool lights hostage to the stadium lights. Although the replacement of the pool lights is part of the proposed project evaluated in the RDEIR, the school board can approve replacement of the pool lights even if they don't approve the stadium lights. Please also refer to response to comment 1 for Letter 2b.



On Thu, Sep 22, 2022 at 4:13 PM Frances Dillard <dillardfran@yahoo.com> wrote:

1 Mitigation Measure 11-4. The proposed Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a superficial, short-term fix for a handful of limited nighttime football games versus addressing the long-term impact of 400 practices/124 soccer and football game (page 103/RDEIR). In addition, nowhere in the RDEIR as part of the Environment Setting does CUSD disclose the chronic current state of transportation, traffic and parking challenges.

I will be providing deeper commentary on why the Mitigation Measure under the Transportation section but one specific section that was "laughable" was on Page 18 of Appendix K: Traffic Management Plan, it states:

2 *CHS, as a neighbor that generates traffic using these streets, will not increase traffic loads through the implementation of this TMP. However, the school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users.*

*These include, but are not limited to ideas such as:*

- *Updating required school area warning signage*
- *Consider posted speed reductions down to 15 MPH in school areas*
- *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include speed humps*
- *Exploring additional stop sign controls at intersection*

For the official record, the below e-mail thread goes all the way back from 2013, whereas CUSD did not once recommended any of the above plan for EXISTING transportation, traffic and parking challenges. CUSD has no credibility for executing or upholding any TMP for the proposed stadium lights when they can't even solve current day-to-day problems. Interesting to see both Karl and Dan Paul were central to the exchanges from 2013. No results, outcomes or resolutions to resolving existing traffic or parking issues.

3 Also to note, the performing art center and swimming pool did not go through a CEQA process and CUSD leadership did not file a signed Notice of Exemption and there is NO 810 Fire and Life Safety form filed with DSA -- thus all this mess is interconnected and not solvable from years ago.

4 It's irresponsible to continue building out CHS, attracting more activities and risking safety during night-time activities. At some point, future thinking of building out CMS as alternative solution has to happen.

Please demonstrate you can think big picture with generational fixes beyond right now satisfaction.



**From:** John  
**Date:** October 12, 2014 at 4:14:57 PM PDT  
**To:** Karl Pallastrini <[karlpallastrini@yahoo.com](mailto:karlpallastrini@yahoo.com)>  
**Cc:** , Martin Enriquez <[menriquez@carmelunified.org](mailto:menriquez@carmelunified.org)>, Marvin Biasotti <[mbiasotti@carmelunified.org](mailto:mbiasotti@carmelunified.org)>, Dan Paul <[dpaul@carmelunified.org](mailto:dpaul@carmelunified.org)>, Rick Blanckmeister <[rblanckmeister@carmelunified.org](mailto:rblanckmeister@carmelunified.org)>, Rick Lopez <[rlopez@carmelunified.org](mailto:rlopez@carmelunified.org)>, ritapatel@allcarerx.net, Johnellison@mac.com, annetteyee@aol.com, StilwelM@pebblebeach.com  
**Subject:** Re: Carmel High School Parking Situation on Morse Drive

Hello Karl,

Thank you for responding to Fran's e-mail. I would like next here to invite Marvin and Rick to meet me one morning on Morse Drive as students begin parking in the neighborhood. It would be enlightening for them to hear from students as to why they park there. I would see this action as a positive first step for the leadership group to understand the problem and honestly demonstrate they will be actively working towards a solution. I can already envision several.

Marvin and Rick, please let me know what morning works for you. I would like to do this prior to the school board meeting on October 29th. Please feel free to call me directly on my cell.

On Oct 12, 2014, at 11:28 AM, Karl Pallastrini <[karlpallastrini@yahoo.com](mailto:karlpallastrini@yahoo.com)> wrote:

Hello

The Board of Education is in receipt of your concern regarding the student parking on Morse Drive. Reading through the history of the correspondence, District Superintendent Marvin Biasotti has responded, and continues to be in the process of responding to the parking issue at Carmel High and the surrounding neighborhood. The solutions to this problem are not simple ones. Continuing with the process of discussion with open communication will render the best results. The Superintendent will provide regular updates to the Board on the status of your concern.

Best,

Karl Pallastrini, President CUSD Board of Education

---

**From:** Frances  
**To:** Martin Enriquez <[menriquez@carmelunified.org](mailto:menriquez@carmelunified.org)>  
**Cc:** Marvin Biasotti <[mbiasotti@carmelunified.org](mailto:mbiasotti@carmelunified.org)>; Dan Paul <[dpaul@carmelunified.org](mailto:dpaul@carmelunified.org)>; Rick Blanckmeister <[rblanckmeister@carmelunified.org](mailto:rblanckmeister@carmelunified.org)>; Rick Lopez <[rlopez@carmelunified.org](mailto:rlopez@carmelunified.org)>; "dillardjohnt@yahoo.com" <[dillardjohnt@yahoo.com](mailto:dillardjohnt@yahoo.com)>; "karlpallastrini@yahoo.com" <[karlpallastrini@yahoo.com](mailto:karlpallastrini@yahoo.com)>; "ritapatel@allcarerx.net" <[ritapatel@allcarerx.net](mailto:ritapatel@allcarerx.net)>; "Johnellison@mac.com" <[Johnellison@mac.com](mailto:Johnellison@mac.com)>; "annetteyee@aol.com" <[annetteyee@aol.com](mailto:annetteyee@aol.com)>; "StilwelM@pebblebeach.com" <[StilwelM@pebblebeach.com](mailto:StilwelM@pebblebeach.com)>  
**Sent:** Saturday, October 11, 2014 11:55 AM  
**Subject:** Re: Carmel High School Parking Situation on Morse Drive

Hello,

I am copying the remaining school board members so that my request for a parking overflow solution doesn't come as a surprise. I hope we can work together for a proactive plan.

Sent from my iPad

On Oct 10, 2014, at 5:34 PM, Frances Dillard <[dillardfran@yahoo.com](mailto:dillardfran@yahoo.com)> wrote:

Hello Folks,

You are not providing sufficient information or a pro-active enough strategy to convince me you are taking the problem seriously and looking for a long-term solution. With project spends of \$23.8 MM, certainly parking allocation was taken into construction planning. I will be asking your offices for better answers and will be making this a priority to push for change now that construction is over. I request:

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con't.

- Your student/faculty ratio compared to the available parking spaces compared to the number of vehicles registered over the past four years?

- Are all new parking slots on the campus appropriately marked and used? Seems to be lots of "clean vehicle" markings that are not being used? Are you pushing vehicles off-campus?

- Have you conducted a poll as to why students are parking off-campus? I stood there one day and personally asked the students – all responded not enough parking on school grounds.

- Have you conducted a poll or reached out the neighborhood as to whether this is an issue? Beyond what is legal or illegal, are you not accountable to being a good neighbor?

Glad you indicated you are aware students do park along Morse Drive. What do you think is the problem? Do you agree you didn't plan for enough parking spaces or are you implying the students are lazy and just find it easier to not register and walk up the hill to class? What do you think is the issue so you can come to a better solution.

This group has a choice, work with me offline to find a solution or I become active during school board meetings, media, neighborhood rallies and any next steps required to solve the problem.

Let me know which way you want me to go.

Sent from my iPad

On Oct 10, 2014, at 4:39 PM, Martin Enriquez <[menriquez@carmelunified.org](mailto:menriquez@carmelunified.org)> wrote:

Hello

We are aware that some students park along Morse Drive, and elsewhere in the neighborhoods around CHS. Last year there was more of a parking challenge on campus due to construction. Several weeks ago I had our campus supervisors place "courtesy notices" on the vehicles parked in the neighborhood, recommending that they register their vehicle and park on campus. We also informed them that they may be at risk of receiving a citation from CHP if they park illegally off campus. As a result we received several new registration requests for parking on campus.

I have spoken with the CHP, who said that unless students are parking near a "no parking" sign or blocking a drive-way, the vehicles are legal to park there. We will continue to encourage our students to park on campus but if you feel that a vehicle is parked illegally, or is blocking your driveway, I would suggest you contact the CHP. For your convenience CHP can be reached at 831-796-2100.

Martin Enriquez

Assistant Principal

831.624.1821 x2788

**From:** Fran

**Sent:** Friday, October 10, 2014 12:00 PM

**To:** Martin Enriquez; Marvin Biasotti; Dan Paul; Rick Blanckmeister

**Cc:** Rick Lopez; [dillardjohnt@yahoo.com](mailto:dillardjohnt@yahoo.com)

**Subject:** Re: Carmel High School Parking Situation on Morse Drive

Hello Folks,

I'm disappointed that I haven't received a response from anyone on this e-mail chain over the last 24 hours. I'm now including Rick Blanckmeister who appears to be in charge of construction planning and should also be accountable for the disastrous neighborhood parking problem created on Morse Drive.

Any immediate response from the group? An acknowledgement that you have received the e-mail would be polite. I will be requesting records for transparency of; number of registered students/teachers for parking spots and number of available parking spots for the past 3 to 5 years over the schools growth in construction and new building additions.

On Thursday, October 9, 2014 5:59 PM, Fran wrote:

Hello Gentlemen,

It has been a year since our last dialogue below regarding the overflow of students parking on the residential streets of Morse Drive. I was promised last year to have patience as you completed construction. In fact, this new school year brings a new meaning to the disaster of overflow parking you have created on our neighborhood streets. It is so baffling there is budget for a new pool, performing arts center, incredible football field and yet, no solution to the parking?

Thoughts before we take next steps on this side?

Begin forwarded message:

5  
con't.

**From:** Fran

**Date:** May 15, 2013, 4:43:47 PM PDT

**To:** Martin Enriquez <[menriquez@carmelunified.org](mailto:menriquez@carmelunified.org)>, Marvin Biasotti <[Marvin@carmelunified.org](mailto:Marvin@carmelunified.org)>, "dpaul@carmelunified.org" <[dpaul@carmelunified.org](mailto:dpaul@carmelunified.org)>

**Cc:** Rick Lopez <[rlopez@carmelunified.org](mailto:rlopez@carmelunified.org)>

**Subject: Re: Parking Policy for Carmel High School**

**Reply-To:** Frances Dillard <[dillardfran@yahoo.com](mailto:dillardfran@yahoo.com)>

Hello Gentlemen,

I am adding Dan Paul to this e-mail chain regarding lack of parking at Carmel High School that is causing student overflow on to the residential streets on Morse Drive.

A thank you to Martin who was the only person that returned my call today. I was hoping to hear from Dan today as well. Today was a particularly hellish day on the street. The Sheriff was called to ticket illegally parked cars.

As I mentioned to Martin on the phone - I do believe as leaders you are accountable for creating a lack of parking situation at the High School that is now negatively the neighborhood. I am requesting two things:

**1. Insight into the planning of the new construction on Carmel High School Property:**

- What was the proposed parking-to-student/faculty ratio? What were the measure taken into consideration during planning?
- What growth was anticipated? What was short-term/long-term plans to help the neighborhood?
- Dan - your colleagues on this note seem to imply they are powerless in this process and you are the key to this project planning?

**2. What is the school district doing to put a plan in place to minimize this problem?**

- I see no active plan - Task Force, policy being discussed or planned?
  - I don't buy the answer "sorry - we can't do anything about this"
- Sorry folks, but this is a real problem that requires an action plan (not just an e-mail reply).  
Let me know what your next steps.

---

**From:** Martin Enriquez <[menriquez@carmelunified.org](mailto:menriquez@carmelunified.org)>

**To:** Marvin Biasotti <[Marvin@carmelunified.org](mailto:Marvin@carmelunified.org)>; Fran

**Cc:** Rick Lopez <[rlopez@carmelunified.org](mailto:rlopez@carmelunified.org)>

**Sent:** Friday, April 26, 2013 3:46 PM

**Subject:** RE: Parking Policy for Carmel High School

Hello

I see you have specific questions regarding our parking policy. I've taken the liberty to copy and paste your questions below to ensure that I answer your questions completely:

"My question was, do you have a parking policy for students?

- are students required to register their cars?
- is the policy written and communicated in a handbook?
- does your insurance policy have mandatory requirements that need to be met for student safety?
- how are you communicating and enforcing policy?
- were no environmental studies done before construction? What was your plan?"

1. Students are required to register the vehicle if the plan on parking on campus. To register we require a current driver's license, registration and insurance. Students who park off campus are not required to register their vehicle.

2. This policy is communicated to students and parents via handbook and newsletters. Included in the policy are expectations of safe driving and student behavior.

3. I apologize, I'm not sure what you mean by "your insurance". We take great pride of our student driving and parking policies and the enforcement of them. Student safety is our main priority and if you have any information of reckless driving please don't hesitate to let me know.

4. Our driving and parking policies are enforced progressively through written warnings, parking stickers, discipline referrals, suspension of parking privileges, and suspension from school.

I hope I was able to answer your questions. Please let me know if you additional questions.

Martin Enriquez

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con't.

-----Original Message-----  
From: Marvin Biasotti  
Sent: Tuesday, April 23, 2013 2:53 PM  
To: Fran  
Cc: Rick Lopez; Martin Enriquez  
Subject: RE: Parking Policy for Carmel High School

Hello Fran

I want to be clear that I was empathizing with the problem that you brought to my attention. Simply put, if you say you have a problem because CHS students that are parking in your neighborhood, then I accept that on face value.

With respect to your statement that "you" (the district) created the problem, I must disagree. As I attempted to explain in my first response, the school currently offers the same number of student parking spots that it has for at least the last 40 years. We were able to offer more spaces for the first eight months of this year, but only due to a temporary circumstance.

Fortunately, the district was able to include plans for nearly enough spots to replace the temporary parking as part of the current construction project. As a result, when the students return in the fall they will have access to more spots than existed in the past.

As for your questions about the student parking policy at CHS, I will defer to the Assistant Principal, Martin Enriquez. Please expect a response from him in the coming days. Thank you.

Marvin Biasotti  
Superintendent  
CARMEL UNIFIED SCHOOL DISTRICT  
P (831) 624-1546 x 2020  
F (831) 626-4052  
[mbiasotti@carmelunified.org](mailto:mbiasotti@carmelunified.org)

-----Original Message-----  
From: Frances  
Sent: Saturday, April 20, 2013 7:50 AM  
To: Marvin Biasotti  
Cc: Rick Lopez;  
Subject: Re: Parking Policy for Carmel High School

Thanks. We appreciate that:

1. You acknowledge there is a problem
2. You created the problem

My question was, do you have a parking policy for students?

- are students required to register their cars?
- is the policy written and communicated in a handbook?
- does your insurance policy have mandatory requirements that need to be met for student safety?
- how are you communicating and enforcing policy?
- were no environmental studies done before construction? What was your plan?

We are not satisfied with how you are handling the situation herein. As leaders, you are required to do more than acknowledge there is a problem. You are accountable for solutions to the community you serve. So, please provide specific responses and your indicated next steps.

We really don't want to rally the neighbors and make this a bigger issue.

5  
con't.

Best,

Sent from my iPad

On Apr 19, 2013, at 6:42 PM, Marvin Biasotti <[Marvin@carmelunified.org](mailto:Marvin@carmelunified.org)> wrote:

> Hi Fran,

>

> I apologize for my delay in responding as I've been in meetings for the past two days.

>

> I'll begin by stating that I recognize the problems created by the overflow of student parking into the surrounding neighborhood and wish there was something I could do about it in the near term.

>

> With the onset of constructing the new science wing at CHS, the availability of parking spaces for students has returned to the historical level. I say that because when the construction of the theater began a few years back, a portion of the student lot at the front of the school became unavailable for student use. To compensate for this loss, we directed the displaced students to park on the grass (now dirt) field in front of the gym. When the regular lot was returned to student use, we continued to allow the use of the dirt field for parking, thus resulting in more parking than had been historically available. We knew that this was a temporary situation that would end when construction of the new wing began on the field.

>

> In addition to experiencing the effects of the loss of student parking on the field, you are also likely experiencing more intrusion into your neighborhood because it is spring. As the school year progresses, more students become age-eligible to drive and the demand for parking rises accordingly.

>

> This problem should be mitigated to a large extent when the students return in the fall. This summer we will add approximately 40 new parking spaces to the main lot as part of the building project currently underway. That will return the number of available spots to a level very close to when both the main lot and the dirt lot were available for student parking.

>

> Beyond that, we will do everything we can to include more parking spaces in the final (hopefully) building project at CHS. At this time next year we expect to be proceeding with the rebuilding of the administration building at the front of the campus. We are currently exploring all practicable options for expanding parking as part of that project.

>

> Again, I apologize for the problems created by the overflow of student parking. We truly want to be good neighbors. Please don't hesitate to let me know if you have additional questions or concerns.

>

> Sincerely,

> Marvin Biasotti

> Superintendent

> CARMEL UNIFIED SCHOOL DISTRICT

> P (831) 624-1546 x 2020

> F (831) 626-4052

> [mbiasotti@carmelunified.org](mailto:mbiasotti@carmelunified.org)

>

>

> -----Original Message-----

> From: Fran

> Sent: Thursday, April 18, 2013 5:21 PM

> To: Marvin Biasotti

> Cc:

> Subject: Parking Policy for Carmel High School

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- > Hello Marvin,
- >
- > My husband and I are residents/homeowners behind Carmel High School.
- >
- > We'd like to know what is the school's parking policy for the students that park off property?
- > We must admit that with all the recent new buildings going up on school grounds it appears students don't have anywhere to park....leaving a trail of cars down our residential streets.
- > Neighbors are getting restless.
- >
- > Please let us know of your policy and how are you enforcing?
- >
- > Best
- > Fran
- >
- > Sent from my iPad

## Response to Letter 10c, Frances Dillard

1. This comment is regarding the Traffic Management Plan required by Mitigation Measures 11-4. In summary, the plan requires providing off-campus parking at Carmel Middle School and providing shuttles to and from the games, as well as encouraging modes of transportation other than automobiles, on-site traffic management and supervision, and off-site parking management. Implementation of the plan would ensure sufficient parking during high-attendance events. The Traffic Management Plan is only necessary for the three annual high-attendance events; it is not necessary to address practices and all of the games played at the high school.

Section 3.0, Environmental Setting, does document the existing on-campus parking at the campus, as well as the off-campus parking in the neighborhood, beginning on page 3-21.

2. This comment is regarding the existing parking issue of high school students parking in the neighborhood. The commenter states that the school district has not addressed this issue in the past. This comment is about existing conditions and is not the RDEIR. However, the proposed project does include providing an additional 111 on-campus parking spaces that would be used by staff and students during the day, and for school events in the evening. As presented above in response to comment 1, the Traffic Management Plan would be implemented for the high-attendance events, where on-campus parking would not be sufficient. No changes to the RDEIR are required.
3. This comment is about past projects and CEQA processes at the high school. It is not about the proposed project. Past projects, including the performing arts center and swimming pool that were previously constructed as part of the district's 2008 Modernization and New Construction at Carmel High School Project, and the categorical exemption determination for these projects under CEQA per Board Resolution No. 08-08 (dated February 11, 2008), are not the subject of the RDEIR, and therefore, no response is necessary.
4. This comment is regarding "risking safety during night-time activities;" however, no evidence is provided that the project would result in safety issues resulting in an adverse environmental impact. Therefore, no response is necessary.
5. This "comment" is a string of emails between the commenter and various school district staff and board members in 2014 regarding students parking in the neighborhood. It is not about the proposed project or the RDEIR and therefore, no response is necessary; however, it should be noted that the proposed project includes 111 additional on-campus parking spaces.

**From:** [Frances Dillard](#)  
**To:** [Ted Knight](#); [Teri Wissler Adam](#)  
**Cc:** [Anne-Marie Rosen](#); [Dan Paul](#); [Jessica Hull](#); [Karl Pallastrini](#); [Sara Hinds](#); [Seaberry Nachbar](#); [Tess Arthur](#); [feedback@carmelunified.org](mailto:feedback@carmelunified.org)  
**Subject:** Re: RDEIR: Correct E-mail Addresses  
**Date:** Sunday, September 25, 2022 11:22:16 PM

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Thank you.

We'll also put in our file that CUSD was not aware they didn't own a simple CUSD.org for an e-mail address connected to a multi-million dollar project that is highly controversial to the community. Was that a EMC Planning miss?

On Sun, Sep 25, 2022 at 9:47 PM Ted Knight <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)> wrote:

Ms. Dillard,

Carmel Unified does not own the CUSD.org domain so we have no ability to “accept feedback” from that address. The error was corrected immediately, the same day the NOC was issued. We will add your feedback to our file.

Thank you, Ted

On Fri, Sep 23, 2022 at 6:32 PM Frances Dillard <[dillardfran@gmail.com](mailto:dillardfran@gmail.com)> wrote:

Hello Ted,

I'm getting feedback from residents in our neighborhood that your "switch" of the e-mail addresses are causing a bit of confusion. Shouldn't it be an easy fix to accept feedback from both accounts given CUSD made the mistake and had to republish a new one? Similar to the time switches with the Special Meeting - seems like either these small slips are bad mistakes or appear to be deliberate.

Should be an easy IT fix to accept feedback from both accounts and/or redirect?  
Can you please confirm that you would be open to meeting the community on that end?

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Good afternoon Ted,

Thanks for your note! — please let your staff know the address we were all given for community responses to the REIR we were all given is incorrect and should be updated.  
It took a lot of effort to figure where to email.

Should be [feedback@carmelunified.org](mailto:feedback@carmelunified.org) instead of [feedback@cusd.org](mailto:feedback@cusd.org)



## Response to Letter 10d, Frances Dillard

1. The commenter expresses confusion regarding which email address should be used for commenting on the RDEIR. Notices were inadvertently provided that included an email address not available to the school district. However, this error was identified immediately on August 25, 2022 when the RDEIR was made available for public review, and the district quickly reissued a revised Notice of Completion with the correct e-mail address that same morning, and was delivered the correction to everyone who received the first notice (including the commenter), explaining the error, and identifying the correct email address for comments.

**From:** [Frances Dillard](#)  
**To:** [Ted Knight](#)  
**Cc:** [Anne-Marie Rosen](#); [Dan Paul](#); [Jessica Hull](#); [Karl Pallastrini](#); [Sara Hinds](#); [Seaberry Nachbar](#); [Tess Arthur](#); [feedback@carmelunified.org](mailto:feedback@carmelunified.org)  
**Subject:** Re: Delivery Status Notification (Failure)  
**Date:** Sunday, September 25, 2022 11:12:36 PM  
**Attachments:** [image.png](#)  
[icon.png](#)

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Thank you Ted,

It's not about your district offices - it's about the Federal Holiday and mail is not delivered. Thus, the public deadline for having physical mailed in comments to your offices is October 7th - that is not the full 45 days of legal review requirement. I just want that to be officially part of the "feedback" that will be captured in this process.

On Sun, Sep 25, 2022 at 9:52 PM Ted Knight <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)> wrote:

Ms. Dillard,

Thank you for your feedback, we will add it to our file. For your information, our district offices are open on October 10th as neither "Columbus Day" nor Indigenous Peoples Day is an observed state holiday, or school holiday, in the state of California.

Thank you, Ted

On Sat, Sep 24, 2022 at 9:38 AM Frances Dillard <[dillardfran@gmail.com](mailto:dillardfran@gmail.com)> wrote:

Ted and School Board Members,

In addition to the mix-up in e-mails (that we'd like to you fix ASAP), we'd like you to recognize that your instructions state:

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- Comments **must be received by** October 10 at 5 P.M. (which is a holiday - Columbus Day) vs. "stamped by".

Does that give everyone the full legal amount of time to review and provide comments? Seems like you are cheating folks on a couple of fronts from incorrect e-mails to not really allowing 45 days for commenting. This doesn't feel very community forward and on a highly controversial topic that will cost taxpayers millions of dollars.

So duly noted your welcoming leadership approach for community engagement.

## Response to Letter 10e, Frances Dillard

1. This comment is about the end of the public review period, which officially ended on Monday, October 10<sup>th</sup>, which is a federal holiday. Neither “Columbus Day” nor Indigenous People’s Day is an observed state holiday, or school holiday in the State of California. Although the school district office was open on October 10<sup>th</sup>, and members of the public were able to personally deliver or e-mail written comments on the RDEIR on October 10<sup>th</sup> despite the federal holiday, the school district has accepted all written comments that were received via the U.S. mail on Tuesday, October 11<sup>th</sup>.

**From:** jhull@carmelunified.org on behalf of CUSD Feedback <feedback@carmelunified.org>  
**Sent:** Monday, October 3, 2022 8:20 AM  
**To:** dillardfran@gmail.com  
**Cc:** Seaberry Nachbar; Anne-Marie Rosen; Sara Hinds; Tess Arthur; Karl Pallastrini; Jonathan Lyons  
**Subject:** Re: RDEIR: Providing Public Comment on

Thank you. Your feedback has been received.

-Carmel Unified School District

On Sat, Oct 1, 2022 at 2:43 PM <[dillardfran@gmail.com](mailto:dillardfran@gmail.com)> wrote:

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Including one more photo of Intersection of Scenic Highway 1 and residential street of Morse. This would be unsafe at Night.

Please provide Emergency Access Plans - current and with proposed changes.

On Oct 1, 2022, at 2:32 PM, Frances Dillard <[dillardfran@gmail.com](mailto:dillardfran@gmail.com)> wrote:

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**PROBLEM:**

RDEIR Transportation Impact 11-4. has accurately been captured as: *An Increase in Event Attendance Could Result in Inadequate Parking During Limited Nighttime Events with Potential Emergency Access Issues*

The Mitigation Measure 11-4. The proposed Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a superficial, flawed short-term fix for a handful of limited nighttime football games. The proposed TMP creates confusion in law enforcement between event attendees vs. residential parking, causes a nuisance in residential parking limiting our streets. Most importantly, the RDEIR doesn't acknowledge or address the existing chronic problem of inadequate parking and the lack of transparency for existing Emergency Access Routes. This problem currently plagues the CHS campus and surrounding environment on a daily basis.

I am providing this e-mail thread and photos as evidence the proposed TMP doesn't even work during the weekend, day-time-events much less introducing the complexity of execution at night.

**PHOTOS Demonstrate:**

- Lack of plan for on-campus traffic circulation with vehicles parking in front of "No Idling / No Parking" blocking Emergency Access Routes.
- Ticket booth blocking front entrance where the only Emergency Vehicle would have access.
- Conflict of "No Event Parking Signs" with residential cars - how can enforcement tell the difference?
- Cars parked on private property at the corner of Highway 1 / Morse Drive creating safety issues.

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**Proposed Mitigation Measures:**

- Drop temporary TMP plans that can't be legally enforced or upheld.
- Work with residents within 1 mile radius on BOTH Sides of Highway 1 to proactively pull together Supervisor Mary Adams and Monterey Public Works for a long-term "No Parking Resident Only" Solution.
- Implement this effort as sign of trust BEFORE attempting to approve stadium lights. You have more than 10 years of chronic traffic, congestion, circulation issues, parking and safety challenges to address.
- Prove you are a trusted community member that cares about long-term solutions.

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**HISTORICAL THREAD OF FEEDBACK TO CUSD with Board Members All Aware of the Safety Issues**

On Sat, Sep 17, 2022 at 12:45 PM wrote:

Hello Jonathan,

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Yes, I did see you hustling today to help with the traffic and parking at today's game. However, you forgot to notify the neighbors of the "No Event Parking" signs. How is law enforcement supposed to tell the difference between attendees and residents? What if one of the residents was having a kid's birthday party and needed the street parking for a party?

Also, I keep emphasizing safety, safety, safety - not sure why this is not a priority for anyone on this e-mail? Your "ticket stands" are blocking the only access for emergency vehicles. You may want to re-think that. If a child was injured today - you are jeopardizing life safety.

I have alot more notes that I will submit in very detailed form for the DREIR - there is no way you can move to less than significant impact even with mitigating measures. You are a land-locked campus that did not properly plan for growth. As the first DEIR stated: Nighttime Events with SIGNIFICANT: Potential Emergency Access Issues

I hope the students won the game despite the adults not taking safety as a serious topic.

On Wed, Sep 7, 2022 at 10:10 AM wrote:  
Jonathan,

Congrats on the Padres win at the Shoe Game. As many of the residents noted last night, school spirit seems high and winning games are possible without stadium lights. Please clarify the one statement you made last night: you believe that the "No Event" parking mitigation attempt was successful? Please expand on those key points so that the board can be properly informed. This is one of the "feeders" into the RDEIR What we witnessed:

- You did not properly notify the California Highway Patrol or the broader Monterey Sheriff's Office.
- Folks did indeed park on Morse Drive and it was complete chaos on who should be ticketed and why. (one photo attached - the neighborhood has large file videos if you want us to send)
- The Monterey County Sheriff on duty only ticketed half the cars: Section 22504 - Stopping, parking, or standing upon highway in unincorporated area
- People departing the game were angry half the cars were ticked and half were not "Why me - Why not him"
- When the California Highway Patrol arrived, they clearly communicated they were unaware of any "No Event Parking" plan.
- CHP pointed to the conflicting unapproved "No Event Parking" signs you put up right under the real legal signs (complete conflict with each other and one being "fake and unenforceable" (Photo attached)
- The residents were conflicted. How are you supposed to tell the difference from resident to event participant?
- You completely ignored the other side of Highway 1. So, everyone jammed those residential streets and unsafe crossings were happening from Hatton street (no sidewalks) to Ocean Ave to try and get to the cross-light.

If all the above was happening at night - oh my - please don't tell me that wouldn't be a safety disaster. Please also remember, there is a new crop of students every year. This is not something that is perfected and you've got it down pat. CUSD has no jurisdiction on the surrounding streets of CHS. You kindly remind us you have no jurisdiction when it works to your convenience.

Speaking of which, you've indicated that the neighborhood needs to work more closely with law enforcement to enforce the signs that are already in place. You've pointed to the fact the SRO (that you pay for) is empowered to write tickets - especially near North Carmel Hills. In

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speaking with the SRO, he confirmed - he is off the clock by 3 PM when the afternoon pick-up chaos begins.

Please be truthful in the facts less the School Board Members walk away that your traffic mitigation plan was a success.





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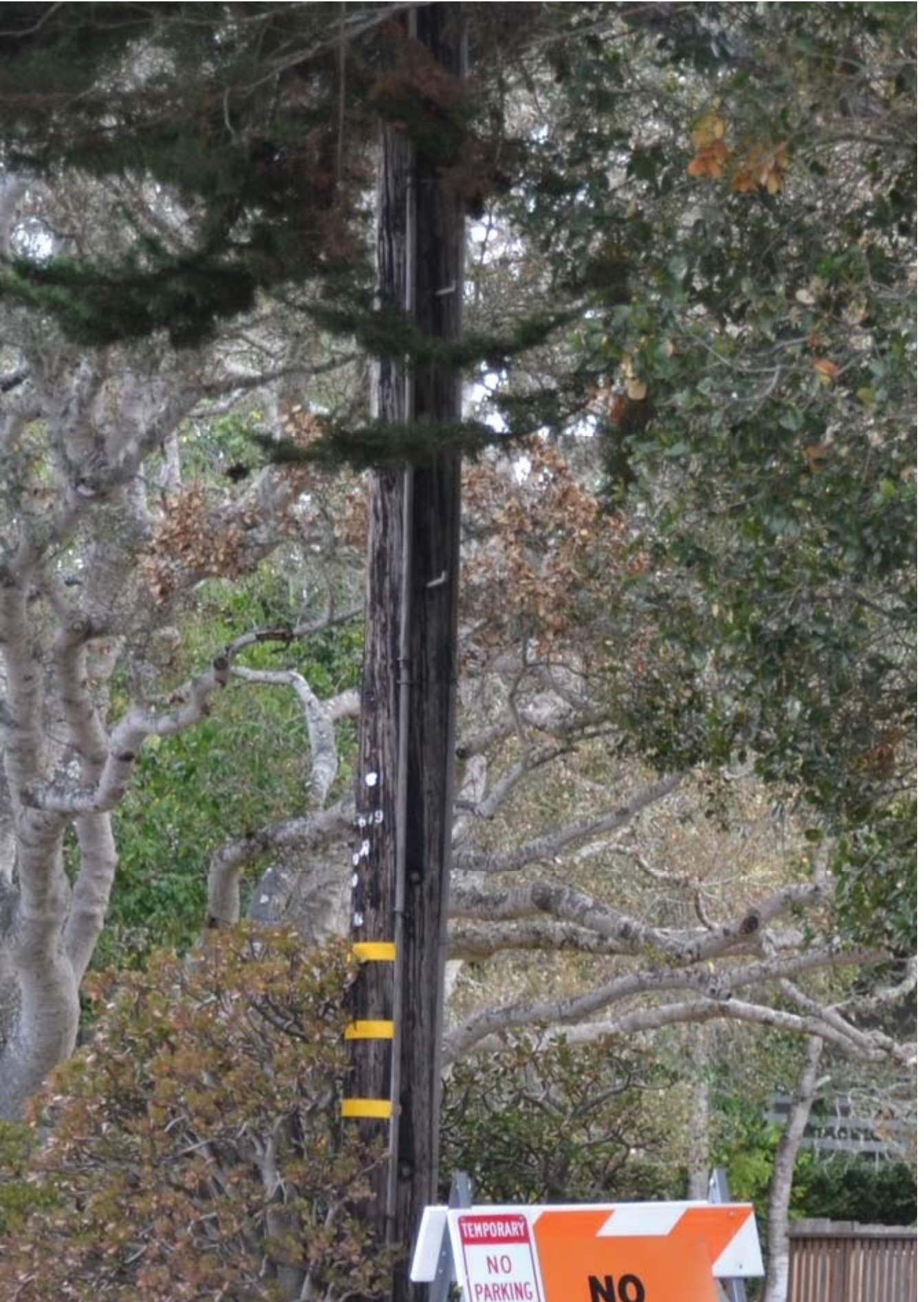


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## Response to Letter 10f, Frances Dillard

1. The comment provides a photo alleged to be taken of cars parked at the intersection of State Route 1 and Morse Drive. With implementation of the Traffic Management Plan (Mitigation Measure 11-4), parking at this location would be restricted to residents only. Emergency access routes, ingress and egress, as well as internal circulation, for everyday or for emergencies is presented in Figure 4-1, Overall Site Plan, and Figure 4-6, Post Development Overall Parking Exhibit, as well as response to Letter 14-2-f. With implementation of Mitigation Measure 11-4, parking during the most highly attended events would not result in a significant environmental impact or emergency access issues. No changes to the RDEIR are required.
2. See response to Letter 10d, comment 1.
3. The commenter asserts that the Traffic Management Plan (Mitigation Measure 11-4), cannot be legally enforced; however, the school district does have the authority to implement the plan and obtain an encroachment permit from Monterey County for temporary signs on the public roadway system. The commenter requests, instead, a long-term “No Parking Residents Only” solution, and describes existing traffic and parking conditions. Please refer to response to comment 5 for Letter 5.
4. The commenter provides a historical thread of emails between the commenter and Jonathan (assumed to be the Carmel High School principal) concerning existing traffic and parking conditions, but conclusive evidence is not provided. More specifically, the emails are regarding game attendees parking in the adjacent neighborhoods and the school staff’s attempt at managing the parking with no event parking signs. Regarding management of the traffic and parking upon implementation of the proposed project, see Section 11.0, Transportation and Parking, of the RDEIR, and Mitigation Measure 11-4, which requires preparation, adoption, and implementation of a Traffic Management Plan for the high-attendance events. Traffic safety and emergency access is also addressed in Section 11.0, Transportation and Parking (see pages 11-13 through 11-19 of the RDEIR) and shown in Figure 4-1, Overall Site Plan, Figure 4-6, Post Development Overall Parking Exhibit. See also response to Letter 14-2-f.

----- Forwarded message -----

From: **F. Dillard** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>

Date: Tue, Oct 4, 2022 at 5:04 AM

Subject: Public Comment on RDEIR for CHS Stadium Lights

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact



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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_IrZgQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_IrZgQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

F. Dillard

[dillardfran@yahoo.com](mailto:dillardfran@yahoo.com)

Carmel, California 93923

## Response to Letter 10g, Frances Dillard

1. See response to letter 2b.

From: **Robert Kahn** <[rkinsocal@aol.com](mailto:rkinsocal@aol.com)>  
Date: Wed, Sep 7, 2022 at 12:39 PM  
Subject: Bright lights, little city.  
To: Sara Hinds <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, Tess Arthur <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, Karl Pallastrini <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, Anne-Marie Rosen <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>  
Cc: Dan Paul <[dpaul@carmelunified.org](mailto:dpaul@carmelunified.org)>, Anne-Marie Rosen <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, Yvonne Perez <[yperez@carmelunified.org](mailto:yperez@carmelunified.org)>

Sara as Board President and BOE,

There is a very easy way forward for you and board in a thoughtful, meaningful and community oriented way ( All stakeholders - CHS/Community).

1

In light of the tremendous community resistance, ruse of a report and legal challenges on the horizon at every level, you may want to consider stepping back, putting the Stadium Lights and your other “add ons” on hold while you do further study on the best way to move forward in an environmentally and community sensitive way. Furthermore, it will enable you to pull together a cross section of the community to support your efforts, but do it well and appropriate for the environment, the community and the CUSD students.

Please keep in mind that your leadership, in conjunction with your implicit support, is pitting neighbor against neighbor, which is tearing apart the community. This is unfortunate and highlights that your process is flawed as is your current “proposed” end game. With thought, innovation and community support, a viable and community oriented process and end game is achievable.

Thank you,

Robert

Robert Kahn



## Response to Letter 11a, Robert Kahn

1. Comment noted. The commenter expresses opposition to the proposed project but does not raise an environmental issue. Therefore, no response is necessary.

October 10, 2022, Public Comments about the CUSD Revised Draft EIR dated August 24<sup>th</sup>, 2022. Prepared by EMC Planning. Superintended Knight, BOE members Arthur, Hinds, Nachbar, Pallastrini and Marie Rosen. Submitted by Robert Kahn.

1	Purpose for DEIR 2.0.	Theoretically, to make an informed and thoughtful decision, yet it appears that you have excluded many issues from moisture refraction (fog) to safety of the movement of cars and emergency vehicles to many other salient, important data points that should have been included? Please explain.
2	Methodology	Did your methodology use incomplete data, out of focus photos, excluded visual, safety and community-oriented issues? Please explain?
3	Proposed Project Summary	Has your summary and scope continued to evolve and expand beyond your initial plan? Please explain?
4	Significant impacts.	Your current plan of putting up stadium lights on the football field, tearing out the tennis courts, cutting down the cypress and putting in a new road significantly and negatively impact the environment> Communities adjacent and communities to the south, east, north and west will be affected by the stadium lights and associated light dome that will negatively impact the environment, safety, quality of life and views from the mountains to the sea per your plan – as it appears? Please explain.
5	Mitigation measurements.	Have you admitted that you have no way to mitigate the significant negative impact of the Stadium lights on the environment, the adjacent community, and the extraordinary negative impact the lights will have views that will have the lights directly in their viewshed? Just as the current pool lights negatively impact views. To reiterate – have you not fully acknowledged that you currently have not mitigated any of the negative issues you are creating.
6	Alternatives to current plan.	Have you not explored in detail alternatives such as utilizing CMS. Is CHS built out beyond its wise use of space? Do you have plans to go vertical with larger and higher buildings? Does CMS have almost four time the land that CHS has?
7	Known Controversies	Won't the stadium lights negatively impact the environment, local communities (safety, traffic) and viewshed communities with the lights impacting our "dark sky areas?" Ripping out the current tennis courts, potential flooding, potentially cutting down Monterey Cypress to build an additional road, increased noise, parking and the cumulative light effects of the pool lights, football lights, parking lights, performing arts center lights and the necessary safety lights that will be needed for the night sports project also affect the local and community, those with a viewshed and the environment?
8	Carmel Character	Does Carmel proper, Pebble Beach, Santa Lucia and other areas have dark sky areas? Does Carmel have within its municipal codes – limits on the wattage and type of light that can be used on private property? For CUSD to put up powerful stadium lights in one of the most scenic areas of the state of California, essentially on plateau that can be seen for miles consistent with our current environmental sensitivity.
9	Liability for the BOE and individual members	Will the CUSD BOE be liable for any potential injuries or deaths from creating an unsafe ingress and egress to the sports complex due to limited emergency access. Will the superintendent and board members be held personally liable as board members should a student or adult be hurt? Has the superintendent and board had substantial and sufficient time and resources to research, assess and review the current plan they are proposing. The plan, as vetted, has been shown to have many safety and community issues that EMC and by default, the BOE and individual members say cannot be mitigated. That means that if you move forward, you are taking it upon yourself and a BOE and personally to be liable for any safety and community issues pertaining to personal injury, quality of life and economic damages.
10	EMC DEIR sponsored and supported by Superintendent Knight and the board members – photos, data	The EMC Planning Group Inc DEIR 2.0 is an abomination of misinformation, lacking information and deception that make Washington politicians appear to be saints. The use of bad data, out of focus photos, photos with no moisture (fog), photos positioned behind trees, photos taken from specific points to minimize the actual impact, the parking calculations ( or lack of calculations) and

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		many other miscalculated or deceptively calculated figures would make most people laugh.
11	EMC DEIR sponsored and supported by superintendent Knight and the board members – number of games.	The lights, as stated by DEIR 2, would be used for Boys football, Boys Soccer, Girls Soccer, Boys Lacrosse, Girls Lacrosse, Boys track and field, Girls track and field, Girls hockey – and most likely Band practice and perhaps non-CHS events as the field may be a rentable asset just as the CHS performing arts center. Thus, the lights may be on for 100's of nights as our weather here is moderate.
12	EMC DEIR sponsored and supported by superintendent Knight and the board members – tax dollars	Has your DEIR 2.0 taken into consideration the tax dollars provided by landowners supporting CUSD may not want to entertain the idea that CUSD is being irresponsible with mother nature and her environment – let alone, negatively impacting the character and monetary value of the community within view of the CHS?
13	2008 pool expansion, lights and performing arts centers.	Your DEIR 2.0 comments on and leans on the current pool lights as a rational for allowing the stadium lights to go up. Superintendent Knight, since you the 7 <sup>th</sup> super in 8 years (plus or minus), you get a pass, but Pallastrini and Hinds, you are well aware that no CEQA study was done, that lights were not originally included in the initial plan and most likely lines were crossed that shouldn't have been – in my view. Again, in my view to put up a building the size of the performing arts center, expand the pool as you did, put up super bright lights on 70 plus/minus foot poles and improve the stadium without going through the appropriate regulatory process is just wrong. Your intentions may have been good and noble, but your process and end game – not so much. You negatively impacted many people – especially with your “ Pallastrini pool lights.”
14	DEIR 2.0.	You need to shut this current plan down, step back and reach out to the community to come up with an environmentally and community sensitive plan that will provide for your objectives while not negatively impacting the environment and Carmel Community.
	Specific Items.	
15	Scope:	Has your DEIR 2.0 expanded to now include demo of tennis courts, create two new parking lots and lights ( which you don't mention), stadium storage and replacement of pool lights other pool area modifications?
16	Authority:	Do you profess to be able to move forward regardless of local planning regulations and the input of the community?
17	DEIR 2.0	Does your DEIR 2.0 profess to be neutral, yet positions the issues in such a way to minimize the issues – let alone use bad data, low resolution photos, view points that are nonsense and exclude information that may be helpful?
18	Point 1.4 on page 1-5:	Is your statement that the proposed project does not conflict with any local applicable local plans a lie?
19	Page 2-4/Alt 4 – CMS	Does your description misrepresent the facts and impact of using the CMS, with a thoughtful and innovative structure to contain the light pollution and improve parking, ingress and egress?
20	Page 3-1 -Regional setting	Does your description understate the beauty and sensitivity of our beautiful area?
21	Page 3-2	Does your description of the general plan and zoning understate the overall nature of our area?
22	Fig 3-1	Does your photo show that you are land locked, is directly nest to a designated scenic highway (1) and areas surrounded by residential neighborhoods.
23	Fig 3-4	Do these picture frame a very limited “actual” picture of the lay of the land.
24	Page 3-16	Does this section highlight that the lights may be on for more than 400 times a year?
25	Fig 4-2	Do you illustrate how the light will bounce off these lights with the addition of fog?
26	Fig 4-10	Do you show the additional parking lights necessary for safety?
27	Page 5-1	Do you illustrate the damage you will be doing to Scenic Hwy 1?

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28	Page 5-3	Do you understate that CHS is in a highly sensitive visual area?
29	Page 5-8	Do you minimize the impact you present for standards of significant issues
30	Page 5-19	Do you minimize the significance of the visual impact?
31	Figure 5-1b	Is this picture deception? Does this picture show the current pool lights as being of less intensity than the safety lights on the back of the school? And does this picture show the side lights of the performing arts center to be brighter than the pool lights? Has this picture been manipulated in anyway electronically or otherwise?
32	Fig 5-2	Ouch. Do your lights affect a large part of the world?
33	Fig 5-3	Scenic Highway 1 and Ocean/it appears that a building with reflective windows was put in? And it appears that the stadium lights do not show any moisture in the air? Do you really believe this photo?
34	Fig 5-4	Do I see stars in the sky? Please provide the number of days that we see stars in the sky versus having some moisture or fog? Do you really believe this picture?
35	Fig 5-3	Excellent picture. Please explain the differences in size of the school grounds at CMS vs CHS. Is there substantially more land at CMS?
36	Fig 5-4a	Please advise where those reflective buildings went that were in fig 5-3? Do the poles that you show look ugly? Would you want them in your backyard or viewshed. This does even discuss the environmental impact the light has.
37	Figs: 5-5a, b	Are you showing the parking lights? Would you want these in your backyard?
38	Fig 5-6	You need a new photographer: As previously mentioned, are your safety lights brighter than your pool and proposed stadium lights. Is this picture a manipulated fraud?
39	<b>Fig 5 -6a, b</b>	<b>Candidly, these are my favorites. Does the shrubbery (near depth) appear to be more in focus than the high school? Is the high school out of focus? Are the current pool lights hard to see due to the photographic and perhaps special effects that EMC did technique used. Superintendent Knight, you visited Carmel Views, is this an accurate photo of the high school, current pool lights and how the football stadium lights will look? Please advise your Board colleagues yes or no.</b>

Thank you for your time.

Warmly,

Robert Kahn

## Response to Letter 11b, Robert Kahn

1. This comment is regarding fog, safety and emergency access. Regarding fog, see response to Letter 2b, comment 2.
2. This comment is regarding visual and safety issues. Visual issues are addressed in Section 5.0, Aesthetics, of the RDEIR, and safety (traffic) issues are addressed in Section 11.0, Transportation and Parking, of the RDEIR. The photos used in the photo simulations in Section 5.0 of the RDEIR are not out of focus.
3. This comment is not clear, but it is assumed this comment is about the school district's decision to add parking lots, remove the tennis courts and other structures, replace the pool lights, and other improvements to the original plan, which just included the stadium lights. In response to public comments on the original DEIR received during the original public comment period, the school district expanded the scope of the project to address raised concerns.
4. This comment is regarding several issues, all of which were addressed in the RDEIR. Please note that contrary to the comment, there are no "plans" to cut down the Monterey cypress trees. The commentor notes that there will be significant impacts, as presented in the RDEIR.
5. This comment is regarding the significant lighting impact, which was identified in the RDEIR as significant and unavoidable, even with implementation of mitigation measures. The proposed project includes replacement of the pool facility lights, which would reduce the existing lighting impact of the pool facility lights. This is discussion in section 5.0, Aesthetics, of the RDEIR.
6. This comment is about building the project at Carmel Middle School. Alternative 4, Alternative Location (New, Lighted Stadium at Carmel Middle School) for Practices and Games, is discussed and evaluated as an alternative to the proposed project in Section 18.0, Alternatives of the RDEIR. Unknown future projects at Carmel High School are outside the scope of the RDEIR.
7. This comment is about the areas of controversy known to the school district when the RDEIR was prepared. The areas of controversy are discussed in Section 2.0, Summary, of the RDEIR, as required by CEQA. Each of the areas of known controversy were addressed in the RDEIR.
8. This comment is about areas in the vicinity that may have dark sky areas, the city of Carmel's municipal code, and the impacts of stadium lights on a plateau, which is defined as an area of relatively level high ground. The stadium is located at 330 feet above sea level (Pacific Ocean), which is approximately 1.25 miles to the west. The city of Carmel-by-the-Sea is

located west of the project site. From the Pacific Ocean, the city slopes up gently to the east. Beyond the high school, the neighborhood is varied in elevation, ranging from approximately 250 to approximately 345 feet above sea level.

**Lighting Impacts.** While the proposed stadium lights would have a significant and unavoidable adverse environmental impact on the night sky in the vicinity when the lights are turned on, the lights will be dark-sky certified by the International Dark-Sky Association (IDA). See Section 5.0, Aesthetics, for additional discussion about the school district's process for this certification process.

**Carmel's Municipal Code.** The proposed project is located in unincorporated Monterey County, not the City of Carmel-by-the-Sea. See the response to Letter 2b, comment 4, and response to comment 16 for Letter 11b for a discussion of the project's consistency with Monterey County policies.

9. This comment is about liability and economic damages. It does not raise an environmental issue and therefore, no response is necessary.
10. This comment is about visual impacts and parking calculations. Visual impacts are addressed in Section 5.0 Aesthetics, in the RDEIR. See also response to Letter 2b, comment 2. Regarding parking calculation, parking is address in Section 10.0, Transportation and Parking. The proposed project adds 111 on-site parking spaces.
11. This comment is about the number of days in a year the stadium lights would be used. See response to Letter 2b, comment 2.
12. This comment is about the cost of the project. It does not raise and environmental issue and therefore, no response is necessary. Please also see response to comment 3 for Letter 14-1-g.
13. This comment is about the existing pool lights and CEQA. The RDEIR does not lean on the current pool lights as a rational for allowing the stadium lights to go up. The District's Governing Board has the discretion to approve replacing the pools facility lights to reduce the current impact of these lights, separately from consideration of the stadium lights. A decision on the project's merits will be made by the District's Governing Board.
14. This comment expresses opposition to the project. It does raise an environmental issue and therefore, no response it necessary.
15. This comment is about the project description, which is presented in detail in Section 4.0, Project Description, in the RDEIR. The descriptions of the two, proposed new parking lots is presented beginning on page 4-6. The proposed parking lot east of the pool facility does not require new lights because of existing lights already in that area. The proposed project lot replacing the tennis courts does include lights as discussed on page 4-21, "The new parking

lot will be lighted and will feature cut-off luminaires on 12-foot-high poles with three-foot concrete bases. Supplemental/replacement low level (four-foot +/-) pedestrian pathway lights would also be installed.” These new lights are included in the evaluation in Section 5.0, Aesthetics. The replacement of the pool lights and addition of 111 new parking spaces was added to the proposed project scope in response to public comments received during the public review period of the original DEIR.

16. This comment is about local planning regulations and input of the community. Regarding local planning regulations, see response to Letter 2b, comment 4. Although the proposed project and Carmel High School campus are exempt from local zoning ordinances and regulations under Government Code section 54094, it is the district’s goal to comply with local regulations as much as feasible. Moreover, the RDEIR evaluates the proposed project’s consistency with local regulations and policies for purposes of CEQA compliance under each environmental factor category addressed. Please refer to page 3-2 of the RDEIR and the Regulatory Setting subsections under each environmental factor section in the RDEIR for further discussion.

Regarding input from the community, the school district has engaged in a process that facilitates informed decision making and public participation in accordance with the requirements of CEQA. In addition to holding duly-noticed public meetings to solicit public feedback on the original DEIR in both May and September of 2021, the district circulated the original DEIR for public review and comment between August 13, 2021 and September 27, 2021. After carefully considering all public comments received during the public comment period, the district opted to respond to comments by revising the original DEIR and the scope of the project based on community input, and recirculate the RDEIR for a second round of public review and comment in accordance with CEQA Guidelines 15088.5(f)(1). More specifically, the RDEIR was made available to the public for review and comment on August 25, 2022 for a 45-day public review and comment period ending on October 10, 2022. Additionally, while not required under CEQA, the District also held a public meeting on the RDEIR on September 6, 2022. Please refer to Section 1.1, Introduction, of the RDEIR for further discussion.

17. This comment about the neutrality of the RDEIR. The RDEIR was prepared in compliance with the requirements of the California Environmental Quality Act (CEQA). According to CEQA (Public Resources Code §21002.1):
  - a. The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.



- b. Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so.
- c. If economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency if the project is otherwise permissible under applicable laws and regulations.

Section 1.5, Methodology, of the RDEIR explains the methodology used to prepare the RDEIR. The RDEIR is an objective public disclosure document that takes no position on the merits of the proposed project. Therefore, the findings of this RDEIR do not advocate a position “for” or “against” the proposed project. Instead, the EIR provides environmental information on which decisions about the proposed project can be based. This EIR has been prepared according to professional standards and in conformance with legal requirements.

- 18. This comment is about the applicability of local plans. See response to Letter 2b, comment 4 and response to comment 16, above.
- 19. This comment is about Alternative 4. See response to comment 6 above. The RDEIR, including Section 18.0, Alternatives, has been prepared according to professional standards and in conformance with legal requirements. Please refer to Subsection 18.1 of the RDEIR for further discussion.
- 20. This comment expresses concern whether the “regional setting” discussion in the RDEIR understates the beauty and sensitivity of the area. CEQA requires an EIR to include a description of the physical environmental conditions in the vicinity of the proposed project viewed from a local and regional perspective (CEQA Guidelines, §15125(a) & (c)). An EIR’s description of this environmental setting should be sufficiently comprehensive to allow the project’s significant impacts to be “considered in the full environmental context.” The description should, however, be no longer than necessary to provide an understanding of the significant effects of the project and of the alternatives analyzed in the EIR. An EIR must emphasize discussion of any affected environmental resources that are rare or unique to the region, and should also include an evaluation of any inconsistencies between the proposed project and applicable general, specific, or regional plans (CEQA Guidelines, §15125(a), (c), & (d)).

The environmental setting of the proposed project, including its regional setting, is discussed in Section 3.0, Environmental Setting, of the RDEIR. More specifically, the regional and vicinity setting are discussed in Subsection 3.1, Regional and Vicinity Setting, in which sensitive environmental characteristics are identified. These sensitive environmental characteristics are further discussed in detail in Section 7.0, Biological Resources, of the

RDEIR. Similarly, more detailed discussions of the environmental setting specific to each environmental factor category addressed in the RDEIR can be found under each respective section of the RDEIR. For example, in Section 5.0, Aesthetics, of the RDEIR, visual resources and scenic resources are discussed under Subsection 5.1, Environmental Setting. Likewise, although the proposed Project and CHS campus are exempt from local zoning and land use regulations and policies pursuant to Government Code section 53094 (see response to Letter 2b, comment 4), the RDEIR evaluates the proposed project's consistency with local regulations and policies for purposes of CEQA compliance under each environmental factor category addressed. Accordingly, the RDEIR addresses the environmental setting of the proposed project in accordance with CEQA. No changes to the RDEIR are required.

21. This comment does not raise an environmental issue about the proposed project and therefore, no response is necessary.
22. Figure 3-1, Regional Location, is a map presenting the vicinity and regional location of the project site, immediately east of State Route 1. To the extent this comment raises concern with the RDEIR's discussion of the County of Monterey General Plan and zoning regulations, please refer to response to comment 16, above, and Letter 2b, comment 4.
23. Figure 3-4, Project Site Photographs – Existing Tennis Court and Pedestrian Path Site, is an aerial photograph and on-the-ground photographs of the tennis court and immediate surroundings.
24. Section 3.0, Existing Setting, presents the existing setting at the high school where the various changes are proposed. The project description, which states when the proposed lights would be on, is included in Section 4.0, Project Description.
25. See response to Letter 2b, comment 2.
26. See response to comment 15 above.
27. There are no proposed changes within scenic State Route 1, except to the extent encroachment permits are required for driveways, curbs, and curb cuts as discussed on page 4-39 of the RDEIR. See response to Letter 14-2-s, comment 1. The RDEIR does evaluate the visual impacts of the project when viewed from State Route 1. As noted in Section 5.0, Aesthetics, in the RDEIR (under "Issues or Potential Impacts not Discussed Further"), the visual impact analysis included in the RDEIR does evaluate the proposed project's impact as viewed from State Route 1. However, as noted in Section 4.0, Project Description, the project site, while in close proximity to State Route 1, a Caltrans officially designated State Scenic Highway, does not include any improvements within the State Route 1 right-of-way. Therefore, the proposed project would not substantially damage scenic resources within this officially designated State Scenic Highway. Therefore, it was not necessary to analyze this issue further in the RDEIR as the project would not (in accordance with the CEQA

Guidelines Appendix G checklist for “Aesthetics”) substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

28. According to Figure 14, Monterey County Scenic Highway Corridors & Visual Sensitivity Greater Monterey Peninsula, from the County of Monterey Greater Monterey Peninsula Area Plan, the high school itself, as well as the neighborhood immediately to the north, south, and east, are not located in a visually “highly sensitive” area. They are located in a visually “sensitive” area. However, an area north of the campus, in the vicinity of Agujaito Road and Jack’s Peak, is in a “highly sensitive” area. Figure 14 of the Greater Monterey Peninsula Area Plan is available online at <https://www.co.monterey.ca.us/home/showpublisheddocument/45898/63638994156963000>

The RDEIR incorrectly identified the project site as being in a “highly sensitive” area on page 5-3 of the RDEIR. This correction has been made. See Section 3.0, Changes to the RDEIR, in this final EIR.

29. This comment is noted. It does not raise an environmental issue and therefore, no response is necessary.
30. The visual impact is not minimized. The RDEIR concluded that the proposed project would result in a significant and unavoidable visual impact, even with the implementation of mitigation measures. A significant and unavoidable impact is the most severe category of impact in CEQA analysis. See Section 1.6, Terminology, in Section 1.0, Introduction, in the RDEIR.
31. Figure 5-1b is a nighttime picture of the campus taken from Outlook Drive across Hatton Canyon northeast of the campus. See section 5.0, Aesthetics, in the RDEIR starting on page 5-14 for the methodology associated with taking the pictures and conducting the visual simulations. See also Appendix F of the RDEIR. The pictures representing “existing” setting have not been manipulated.
32. Figure 5-2 is the Viewshed Analysis Map. Areas marked in red are areas where the stadium lights may be visible though those areas classified as “visible” may still be screened by intervening landscape, which is not a processing parameter in the mapping data that produced this figure. The project would affect several areas in the vicinity, but certainly would not affect a large part of the world, as defined by the Oxford Dictionary as “The earth, together with all of its countries, peoples, and natural features.”

33. Figure 5-3 is a daytime, Google Earth aerial photograph presenting the nine locations where photos were taken for the visual simulations. The Google Earth photo was not modified in any way other than to show the locations of the nine photo locations.
34. Regarding Figure 5-4, the commenter notes that there are stars in the sky and requests the number of days that we see stars in the sky versus having some moisture or fog. The picture was not modified to add stars to the sky. The area experiences clear nights where the stars are visible and experiences foggy nights when the stars and night sky are not visible. The number of days the area experiences either situation is not relevant to the evaluation in the RDEIR. The addition of stadium lights to the high school would result in a significant, adverse, and unavoidable impact visual impact on the nights the lights are turned on, whether or not it is a clear night or a foggy night.
35. Regarding Figure 5-3, the commenter notes that this is an excellent picture and asks about the size of the school grounds at Carmel Middle School versus Carmel High School. Figure 5-3 is a daytime, Google Earth aerial photograph presenting the nine locations where photos were taken for the visual simulations. A comparison of the size of school grounds at Carmel Middle School versus Carmel High School are not relevant to the analysis in the RDEIR.
36. Regarding Figure 5-4a, the commenter wants to know where the reflective buildings went that were in Figure 5-3. Figure 5-4a is a daytime picture taken from State Route 1 north of the school entrance. Figure 5-3 is a daytime, Google Earth aerial photograph presenting the nine locations where photos were taken for the visual simulations. It's not clear to what reflective buildings the commenter references. There are no poles shown in either Figure 5-3 or Figure 5-4a. The light poles are shown in Figure 5-4b, which is a daytime visual simulation of what the light poles would look like from this location.
37. Regarding Figures 5-5a and 5-5b. Figure 5-5a shows the existing daytime view from Morse Drive. Figure 5-5b is a daytime photo simulation of Figure 5-5a with the addition of the stadium and parking lot light poles.
38. Figure 5-6a is an existing daytime view of the campus from Outlook Drive. Figure 5-6b is a photo simulation of the same daytime view with the addition of the light poles. Figure 5-6b is a manipulated photo to visually simulate the light poles, which would be visible from this location on Outlook Drive. The lights would not be on during the day.
39. This comment is about Figures 5-6a and 5-6 b. See the response to comment 38 above.

From: **Meredith Nole** <[ilight8@aol.com](mailto:ilight8@aol.com)>  
Date: Wed, Sep 7, 2022 at 2:09 PM  
Subject: RE: LIGHTING REPORTS -  
To: [dpaul@carmelunified.org](mailto:dpaul@carmelunified.org) <[dpaul@carmelunified.org](mailto:dpaul@carmelunified.org)>  
Cc: Meredith Nole <[ilight8@aol.com](mailto:ilight8@aol.com)>

Hi,

1 I enjoyed meeting you in person last evening.

I'm bringing 2 reports to share with everyone, - too large to attach here, I tried. I'm also bringing in a 80 page report from the IES " SPORT & RECREATIONAL AREA LIGHTING - this is THE standard for all this type lighting applications.

The Report from Marianna Figueroa - is key. Her group's 20+ years of science has documented effects of light on people -she has been requested & is now in her new Lighting Lab at Mt. Sinai Hospital in New York doing her studies. Light effects people - without question, on many levels.

2 Due to all I'm hearing - I think some type alternative to the 80 foot poles is best for all concerned. This is high school - & not Pro or for TV, see if a compromise is feasible. I'm going to Seaside to look at their lighting system there, thanks for mentioning - yet - you know Carmel - it's not Seaside.

I completely hear what you indicated about building codes, - how about a DOME then ??

The school children - in my humble opinion - can learn a great lesson - as the Principal is very emotional about this & wants the students to have the best. If a DOME was installed - they can learn Compromise with your Community, have their lighted field, not have neighbor issues, etc.

The goal is to have an even lit field area, for night games, a DOME could allow for that, without all the confusion, build directly over the existing field 30-35 ft. high. ??

Best Regards  
Meredith

Meredith Nole, MIES  
MONTEREY LIGHTING  
LIGHTING EXPERT  
WHOLESALE SUPPLIER  
TEL: 831-250-5623  
CELL: 862-220-1406  
[ilight8@aol.com](mailto:ilight8@aol.com)

". . be kinder than necessary . ."

For athletic and sports fields, the appropriate level of lighting will depend on the Class of Play and Facilities. Class of Play is divided into 4 categories, depending on the number of fixed spectator seats. (Competition play intended for nighttime TV broadcast may require higher lighting levels).

CLASS I: Competition play at facilities with 5,000 or more fixed spectator seats. (Professional, Colleges & Universities, some Semi-Professional & Large Sports Clubs)

CLASS II: Games at facilities with over 1,500 fixed spectator seats. (Smaller Universities and Colleges, some Semi-pro, large amateur leagues and high schools with large spectator facilities)

CLASS III: Games at facilities with over 500 fixed spectator seats. (Sports Clubs and amateur leagues, some high schools and large training professional training facilities with spectator sections)

CLASS IV: Competition or recreational play with 500 or less.  
Class IV Class of Play applies to games at  
{ which family and close friends of the players and staff are usually  
the majority of spectators. (Smaller amateur leagues, park and  
recreation department facilities, most Little Leagues smaller  
high schools, elementary and middle schools, and social events).

## Response to Letter 12a, Meredith Nole

1. This comment is about two lighting reports, not associated with the proposed project, and concern about lighting effects on human health. Regarding lighting effects on human health, see response to Letter 5, comment 3.
2. This comment is about reducing the 8-foot light poles considerably and constructing a 30-35-foot-high dome over the stadium. The Illuminating Engineers Society recommends the lighting at 80 feet above the playing surface. A 35-foot dome would not provide enough clearance for the football goalposts. The height of the ball in field sports routinely exceeds the height of the press box which is 36 feet above the play surface (Dan Paul, e-mail correspondence with consultant, October 19, 2022). This alternative would not be feasible. No changes to the RDEIR are necessary.
3. The commenter submits information regarding the various classes of various athletic and sports fields. However, this comment does not raise an environmental issue and therefore, no response is necessary.





From: **MEREDITH NOLE** <[ilight8@aol.com](mailto:ilight8@aol.com)>  
Date: Mon, Sep 19, 2022 at 11:26 AM Subject:  
Re: LIGHTING - interesting pictures. To: Dan  
Paul <[dpaul@carmelunified.org](mailto:dpaul@carmelunified.org)> Cc: Meredith  
Nole <[mnole@edgesgroup.com](mailto:mnole@edgesgroup.com)>

Hello Dan,

I'm just sharing interesting pictures of catenary system holding light fixtures from above. I'm not saying this could work - I'm saying having a conversation with this company's engineers might be interesting.

I seem to think when great engineers + physics get together - options sometimes become feasible.

I spoke to this manufacture when I saw these & asked if they would be willing to have a conversation with you & maybe others that you think.

Company is STRUCTURA. Com - in Kansas. Phone # 913-390-8787.

See below.

Meredith Nole, MIES  
MONTEREY LIGHTING  
Lighting Specialist  
Wholesale Supplier  
T - 831-250-5623  
C- 862-220-1406  
"Be kinder than necessary "  
Sent from my iPhone



**Structura, Inc.**

Aug 19 · 🌐

Happy National World Photo Day!  
favorite photos from past projects





## Response to Letter 12b, Meredith Nole

1. This comment is about possible lighting fixture designs. It does not raise an environmental issue and therefore, no response is necessary.

On Wed, Sep 7, 2022 at 6:22 PM <[gbrehmer@aol.com](mailto:gbrehmer@aol.com)> wrote:

Dear Ted,

1 Linger potential COVID symptoms kept me from the September 6th meeting. I hope it went smoothly.

Wanting a picture of the high school campus, I brought up a picture and clicked print. After a while I went upstairs to fetch the copy. To my surprise, it was still printing out the DEIR. It looks like my sister knew what she was talking about when she called me "dim bulb" over 70 years ago. Since about half had printed, I decided to print out the entire document.

I prefer to examine documents I can hold in my hands and which I can annotate.

The EIR on the 1971-72 Odello project south of the river contemplated an 1800 unit new community with all the amenities 1800 new homes needed. It was not as lengthy or detailed as the Lights DEIR.

It is a shame that the CEQA process has been so weaponized.

Blessings.

George

## Response to Letter 13a, George Brehmer

1. This comment does not raise an environmental issue and therefore, no response is necessary.

----- Forwarded message -----

From: <[gbrehmer@aol.com](mailto:gbrehmer@aol.com)>

Date: Sat, Oct 8, 2022 at 4:24 PM

Subject: The RDEIR

To: [tknight@carmelunified.org](mailto:tknight@carmelunified.org) <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>

Dear Ted,

1

I thoroughly reviewed the RDEIR beginning about 4:00 AM this morning. I have more comments which may be submitted Monday or reserved for the Board. However, I find the parking information appalling and had an epiphany. I must speak directly to you.

I attended the Soquel game and parked in my usual spot on Morse Drive. The "No Event Parking" signs were puzzling. The Existing and Proposed Parking Analysis (11-14 to 11-18) explained --- the planned (but not officially adopted) prohibition of parking on streets around the High School had been implemented. However, I remain curious about the legal authority to limit my parking along a public street. Further, and of most importance, it is highly recommended that implementing such prohibition be avoided until the final EIR is adopted. Why? It may never be included in the final plan. There is no legal obligation to do it. Implementing the "No Event Parking" is an appeasement which will not alter the critics behavior. However, doing so will cause them, to get used to empty streets in front of their houses and make it harder to achieve the best for the school. Property owners do not have any more right to park on the public streets in front of their houses than you and I do. We pay the taxes that maintain those streets.

As I walked along the path past the tennis courts a few minutes before the varsity game, I was further puzzled by the sparsity of the crowd. I later connected it to the questionable parking prohibition and inconvenience of shuttling from Middle School.



Now, why I found the parking information appalling. First, it appears to be a major appeasement (major because of the very extensive and unnecessary additional work and expense and reliance on government.) to the critics without any benefit to the students. The problem being that appeasement never works unless there is honor. The critics have none. They are out to kill.

A brief review is revealing. Students and parents and other High School attendees will be encouraged to park at Middle School. The 250 parking places (174 old and 76 new) will be reserved for parking generated by the visiting team. **What if it only generates need for 150 places --- not an uncommon occurrence.** (35 other stalls near the stadium shall be reserve for Carmel players and coaches. **Ninety players plus coaches. They can double up. If a parent brings a player, may the parent park there?** Apparently not. It looks like the parent must drive to Middle School, wait for the shuttle and after the game wait for the shuttle to the Middle School and then drive to the High School to pick up the player and then drive home. **Let's see. That is 4 separate parental traffic movements and 2 shuttle waits. What about cheer leaders, dance team members, Homecoming participants, etc.?**

Further, Carmel students must remove their cars from the campus parking on game days **(football games only? Where to? Middle School? Would a shuttle be available? Do they walk back to campus? Do they park on a Carmel street? Do they all remove their cars at one time? Perhaps just no parking at all on game days. Then they would have to fend for themselves --- not a bad idea.**

Now the RDEIR Parking Analysis really gets dicey. Five or six buses each capable of carrying 56 people requiring 30 minutes each trip between the schools would be used. 1500 to 2000 might attend the P . G. game. If 250 of that number use the guest parking at the High School, that leaves 1750. Assuming 250 of those park elsewhere, the remaining 1500, at the rate of 56 passengers per trip would require 29 trips from Middle School and 29 trips to Middle, total of 58 bus trips on and off Highway One and Carmel Valley Road. In addition to these trips, each car at Middle School would generate another trip driving home.

Assuming 6 busses, 30 minutes a trip and 56 passengers a trip the busses would have to begin shuttling a substantial length of time before the JV game starts. Since most fans stay until the end of the varsity game and, therefore, there could theoretically be as many as 1500 fans to shuttle back to Middle School, the last fans to get a ride would have to wait about 3 hours before being picked up.

HOLY COW!! That will never work.

The plan to manage the parking is even more ludicrous than the plan itself. It calls for a TMP Coordinator. That sounds like the creation of a new and costly and unnecessary position. Paul Miller, Editor of the Pine Cone, has a timely editorial in yesterday's edition which begins "*Creative local governments around the country have been busy inventing new job titles to go with the most up-to-date political trends.*" I am not suggesting that the TMP Coordinator would be the result of a

1  
con't.

political trend. Yet, it may be the result of a trend to demonstrate safety consciousness in response to the bogus concerns of the critics. The perception of need for such a position is proof of the complicated, confusing and conflict causing nature of the plan.

2

Now the EPIPHANY!

According to the RDEIR, the first paragraph on page 11 - 14 states that the adequacy of parking alone is not within the purview of CEQA impacts. Nevertheless, DEIR comments on the project raised concerns about the inadequacy of on campus parking. The foregoing shuttle planning nonsense is a response to this concern. It is all unnecessary. **THERE MAY BE ADEQUATE ON CAMPUS PARKING. IN ANY EVENT, THERE IS, WITHOUT A DOUBT, ENOUGH PARKING TO TAKE A CONSIDERABLE NUMBER OF CARS OFF THE STREETS. WHERE IS THIS PARKING? THE BASE BALL FIELD!!**

Industry as well as EIR preparers think of parking from an engineers point of view --- grading and pavement, construction dust and noise, etc. None of that is needed. The baseball parking lot is there right now. The Community Church of the Monterey Peninsula on Carmel Valley Road next to the Middle School parks hundreds of cars on its grass on several occasions through out the year. The major car shows park hundreds of cars on the grass. The County Fair parks cars on grass. The baseball field solution results in increased safety, a great monetary savings, increased convenience, takes a lot of cars off the streets, makes removal of the tennis courts unnecessary, may make the addition of the other proposed new parking places unnecessary and will save a ton of money. All this benefit without interfering with playing baseball.

3

Before signing off, please take a look at the shuttle/TMP Coordinator PLAN from the point of view of someone interested in freedom and the individual. There is great national concern about increase in government control of our lives. The PLAN centers on extensive government control. Increase in government control always involves increase in the cost of government and, hence, increase in taxes. It also slices away individual independence and resourcefulness. Game attendees have always managed on their own without government intervention. They have common sense.

This whole drain on educational teaching time, creativity and funding is a seriously unfortunate event. It needs to be brought to the attention of our representatives in Sacramento. A committee of locals who may have some clout needs to be formed and energized. CEQA needs some changes.

I plan to comment on the RDEIR.

Blessings.

George Brehmer  
[9801 Club Place Lane](mailto:gbrehmer@aol.com)  
[Carmel, CA 93923](mailto:gbrehmer@aol.com)  
(831) 624-8961  
[gbrehmer@aol.com](mailto:gbrehmer@aol.com)

## Response to Letter 13b, George Brehmer

1. This comment letter is regarding the addition of on-campus parking and the Traffic Management Plan. The commenter states there is sufficient on-campus parking, that the public has the legal right to park in the neighborhood, and that the addition of parking and implementation of a Traffic Management Plan is an “increase in government control of our lives.” The comment does not raise an environmental issue and therefore, no response is necessary.

However, a couple of clarifications are provided. First, the Traffic Management Plan is only required to be implemented during high attendance games. It is not required for every sporting event or even every football game. Second, for the highest-attended games, where school district staff project as many as 2,000 spectators, the commenter assumes that each spectator will arrive in his or her own car. The analysis in the RDEIR assumes 3.24 persons per vehicle (refer to page 11-9 of the RDEIR), result in approximately 617 vehicles requiring parking, for the highest-attended games a couple of times per year. Third, the comment identifies a total of 250 parking spaces with project implementation, however, the proposed project includes the addition of 111 parking spaces for a total parking count (existing and proposed) of 387 parking spaces.

2. This comment is regarding a new alternative – the use of the existing baseball field for temporary parking instead of replacing the tennis courts with a parking lot and implementing the Traffic Management Plan. Parking shortage a couple of times per year for highly-attended games is addressed in Section 10.0, Transportation, of the RDEIR starting on page 11-14. Even with adding 111 permanent new parking spaces on campus (for every-day use), there would still be a parking shortage of 230 spaces a couple of times per year for the highest-attended games, if 2,000 spectators attended these events.

Regarding using the baseball field for temporary parking, instead of converting the tennis courts to permanent parking, the proposed tennis courts parking lot would be a permanent parking lot to be used daily, not just for highly-attended games.

The commenter gives examples of other entities (Community Church of the Monterey Peninsula on Carmel Valley Road and the County Fairgrounds) park cars on their grass areas for major events. However, these are not athletic fields. Parking cars on the baseball field would result in any damage to the field potentially resulting in safety issues for the athletes who use the field. It would also impact the district’s ability to properly maintain the field for athletic purposes, which requires regular watering. Fields used for the parking of vehicles require dry conditions. Therefore, it would not be feasible to park the cars on the baseball field as the field is regularly in use by district students for educational and athletic purposes.

3. This comment does not raise an environmental issue and therefore, no response is necessary.

From: <[gbrehmer@aol.com](mailto:gbrehmer@aol.com)>  
Date: Mon, Oct 10, 2022 at 5:00 PM  
Subject: Comments on CEQA and Revised Draft Environmental Impact Report on the Lights Project  
To: [dpaul@carmelunified.org](mailto:dpaul@carmelunified.org) <[dpaul@carmelunified.org](mailto:dpaul@carmelunified.org)>, [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Dear Dan,

The DREIR appears to be quite adequate.

1 | Having litigated numerous CEQA cases years ago, I am motivated to make some comments of a non-critical EIR nature. Perhaps this huge, "should have been unnecessary", undertaking which defies common sense, will be the inspiration for energy to move the State Legislature to modify CEQA to treat small and large projects differently. Uniting all California schools in the cause would be a worthy public service. That much clout might get something done. This is particularly important since critics can now adopt corporate activist programs such as Action Network out of Washington D. C. Doing so makes critics much more formidable since they are armed to reach not only the Board but also every local postal box.

The Lights Project has very small impacts. Nevertheless, adequacy of the EIR, based on how the law has evolved, must be achieved in order to avoid potential lawsuits. This means all the required elements must be discussed as though the project was a big one with major environmental impacts.

To put the minor nature of the Lights Project in perspective, compare it to the housing subdivision on which I cut my teeth in the early 1970s. It proposed 1800 new homes on the West side of Highway One along the river and the ocean. Imagine the construction, utility, traffic, safety service, school, etc. impacts. Now consider the Lights Project.

2 | The Lights Project is, for the most part, a stationery project. There is a variation in the time of day and anticipated later day use, but the activities will be the same school activities.

In 30 to 45 minutes one can go to nearly all the vantage points for the Lights Project and see or visualize the potential impact for themselves (Try that with an 1800 homes subdivision.). The Project being stationery and the opportunity for all interested, as

2 | well as the decision makers, to to view and visualize for themselves raises the  
con't. | question: Was this CEQA stuff needed in the first place?

3 | PARKING. Some old timers say there were no lights for 70 years and we got along  
just fine and we don't need them now. The same thinking applies to the parking.  
Except applying it to parking makes sense.  
Fans have always worked out their parking arrangements without coaching or  
government intervention. That is the American way. Government and tax payer  
dollars should not step in unless there is a sufficient public benefit. Certainly, it should  
not do so at the taxpayers expense if it is going to cost a bundle of money on an  
ongoing basis.

The shuttle program described in the DREIR to be supervised by a TMP adds a new  
and unnecessary layer of management to a complicated, confusing and conflict  
inducing program. It is important to keep in mind the streets are public domain. The  
fans attending school events paid for them. The lot owners have no special parking  
privileges on the public streets. Do the math on the time it would take to move a  
crowd to and from the High School. Count the bus traffic movements.

4 | The BASEBALL FIELD IS A PARKING LOT. Churches, golf courses, the Fair  
Grounds use grass for parking on a regular basis. Doing so embraces nature. The  
baseball field will park considerable more more cars than the tennis court space --- it  
already does. It is closer to the stadium than the northerly most street parking which  
is frequently used.

5 | TRAFFIC. I have lived here 56 years and have been up and down the hill in front of  
the High School a multitude of times. Traffic is much lighter in evening hours. Thus,  
does not add as much to traffic as daytime activities.

6 | LIGHT. Light is what the project is about. It is interesting to note lights positive place  
in our lives. TWILIGHT and MOONLIGHT coupled with STARLIGHT provide  
inspiration for art, song, poetry prose and spirit. Let's not forget romance. How can  
light have such positive places in our existence, yet, become so vilified?

The sky is illuminated to varying degrees during twilight in the morning and in the  
evening as late as after 10 P. M. in a few months. These illuminations occur 730  
times a year and are wherever you look. The Lights illumination will occur relatively  
seldom and will not be noticeable by most unless one elects to look at it.

The clarity of the Monterey Peninsula atmosphere allows one to read a newspaper by  
moonlight. The moon luminosity is at or exceeding 50% during 12 to 14 days each  
month and reaches 80% or beyond each month. One does not have to look in its  
direction to see it fill the sky.

The CEQA professionals talk about light spillage or light trespass. It sounds like a  
mess or violation of he law. It is neither. It is often unavoidable due to the nature of  
light. At home we may be aware of the neighbors garage light or room windows. In  
our own homes light "spills" between rooms. Certainly reasonable attention will be

6  
con't.

given without compromising the purpose.

Light glare is mentioned. Keep in mind, nearly every light source glares (perhaps not the moon's reflective light). Don't look at the source. The Lights Project is stationery. If you don't look at it, it will not glare for you.

7

**SIGNIFICANT IMPACT.** Boiled down, it means something worthy of attention. It may only be a statutorily required subject with little connection to the project which, nevertheless, must be dealt with. Because an item is deemed worthy of attention, it does not mean that action must be taken with regard to it. One has to determine if the change, disruption or other consequence of an action requires mitigation or if no mitigation is needed or reasonably justified.

8

**CONCLUSION.** The RDEIR repairers bent over backwards in an effort to address all the elements needed in the EIR and to illustrate what might be done. The Final EIR is to contain the information required by CEQA. That information provides a factual basis for the Board to make its decisions. The content of the Final EIR is not intended to tell you what must be done. That is solely up to the Board to decide based on the facts and best interests of the students.

9

**FINALLY,** based on the SaveCarmel.org website and the Postal Flyers, I must conclude that there are a bunch of Turkey Lurkeys on the loose.

Blessings.

George Brehmer

## Response to Letter 13c, George Brehmer

1. The commenter states that the RDEIR appears to be quite adequate, expresses concern that the State Legislature should modify CEQA, and compares the proposed lights to a residential subdivision from the 1970s. This comment does not raise an environmental issue and therefore, no response is necessary.
2. This comment is about the proposed lighting and argues that the activities after installation of the lights would be the same as before, but at a different time of the day. The commenter also questioned the need for CEQA in the first place. The school district, acting as the lead agency, is required under CEQA to evaluate the environmental consequences of implementing the project. No further response is necessary.
3. Regarding parking and the Traffic Management Plan, see response to Letter 13b, comment 1.
4. Regarding the baseball field as a parking lot, see response to Letter 13b, comment 2.
5. This comment is about the commenter's observation that evening traffic is lighter than day time traffic up and down the hill in front of the school, which is State Route 1. No response is necessary.
6. This comment is about the benefits of lights. No response is necessary.
7. This comment is a general discussion about significant impacts, mitigation measures, and the purpose of CEQA. No response is necessary.
8. The commenter states that the RDEIR preparers bent over backwards in an effort to address all the elements needed in the EIR, and provide additional general discussion about the requirements of CEQA. No response is necessary.
9. This comment does not concern an environmental impact or the RDEIR. No response is necessary.



**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Thursday, September 8, 2022 5:50 AM  
**To:** feedback@carmelunified.org; Teri Wissler Adam  
**Subject:** RDEIR: Comments on all the photos in the report

1 Can you please be more honest on the photos in the report? Seriously, all the photos in the report are pretty lame like we don't know what our neighborhood looks like. What was the time all the evening photos were taken or simulated? That looks like dusk not dark. Why only one angle from Scenic Highway 1? Your Notice of Preparation states: *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.*

And yet you show one lame photo from the one tree that MIGHT obscure the Stadium light? Why don't you include that honest description of site in the RDEIR? Even Google Map shows the photo angles you should be putting in the report.

We all walk the field track. It's a public open space. Where are the photos from the inside of the track? Where are photos as I cross Highway 1 from Ocean at the light?

What do the poles look like from the daylight against the Santa Lucia Mountains? Seriously, do we have to get out and take our own photos of the real site for the amount you are being paid to do this report?

Also for your visual simulation of the stadium in one of the appendix. Good try but really? Why this angle? Please zoom out and show the simulation to the impact of Scenic Highway 1 that is protected.

Please don't even get me started on the remaining photos. Same questions. What time of evening are you simulating? Why not do it full dark when the truth shows.

We'll be sending more feedback but that is just reading this bulky report in the morning with my cup of coffee. Report is horrible and upsetting.





## Response to Letter 14-1-a, Bud Get

1. This comment is about the photos and photo simulations in the RDEIR. Regarding the selection of the photo locations (or Key Observation Points), see response to Letter 2b, comment 2. Regarding the time the nighttime photos were taken, see response to Letter 10c, comment 1. No additional response is necessary.

---

**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Thursday, September 8, 2022 6:07 AM  
**To:** feedback@carmelunified.org; Teri Wissler Adam  
**Subject:** Re: RDEIR: Comments on all the photos in the report

1

For all these photos, what time was the "nighttime" simulated at?

Can you zoom out on them and show the context of the Sensitive Area?

You have a map that shows the points where the stadium lights are the brightest, who would see that from the worst angle?

Why is every photo of the best angle vs. the worse case points? This is an impact report? What is the real impact in photos?

Why are the photos still fuzzy? Can't you pick a clear day to show what we see from Outlook drive everyone day walking our neighborhood?

Let us know if you want us to send in the photos of the existing pool lights we can see during our evening walk.

You've ruined my morning coffee before I go to work.

Figure 5-12a, KOP-1 – State Route 1 North (Nighttime Existing) and

Figure 5-12b, KOP-1 – State Route 1 (Nighttime Proposed);

♣ Figure 5-13a, KOP-2 – Morse Drive (Nighttime Existing) and

Figure 5-13b, KOP-2 – Morse Drive (Nighttime Proposed);

♣ Figure 5-14a, KOP-3 – State Route 1 South (Nighttime Existing) and

Figure 5-14b, KOP-3 – State Route 1 South (Nighttime Proposed);

♣ Figure 5-15a, KOP-4 – Outlook Drive (Nighttime Existing) and

Figure 5-15b, KOP-4 – Outlook Drive (Nighttime Proposed);

♣ Figure 5-16a, KOP-5 – Edgefield Place (Nighttime Existing) and

Figure 5-16b, KOP-5 – Edgefield Place (Nighttime Proposed);

♣ Figure 5-17a, KOP-6 – Carmel Knolls Drive North (Nighttime Existing) and

Figure 5-17b, KOP-6 – Carmel Knolls Drive North (Nighttime Proposed);

♣ Figure 5-18a, KOP-7 – Carmel Knolls Drive South (Nighttime Existing) and

Figure 5-18b, KOP-7 – Carmel Knolls Drive South (Nighttime Proposed);

♣ Figure 5-19a, KOP-8 – Carmel Rancho Shopping Center (Nighttime Existing) and

Figure 5-19b, KOP-8 – Carmel Rancho Shopping Center (Nighttime Proposed); and

♣ Figure 5-20a, KOP-9 – Carmel Meadows (Nighttime Existing) and

Figure 5-20b, KOP-9 – Carmel Meadows (Nighttime Proposed).

## Response to Letter 14-1-b, Bud Get

1. This comment is about the photos and photo simulations in the RDEIR. See response to Letter 14-1-a.



**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Thursday, September 8, 2022 6:21 AM  
**To:** feedback@carmelunified.org; Teri Wissler Adam  
**Subject:** Re: RDEIR: Comments on all the photos in the report

1

Okay, now I'm getting madder as I glance at the attachments. what made you pick these KOP's? Why not take pictures from the highest candela's you have on your map and simulate a real evening look from that spot.



Since you have the capability to show this simulation below, why not use the same software to zoom out? Can we have this zoomed out to the level of the impact to include Carmel-by-the Sea? Why is Carmel-by-the Sea not a part of the KOP's on the other side of the highway? Mission Trail is there? What side of west Highway one is being impacted? I do walks off of Shafter way, Hatton Canyon, etc. My house was a mess with all the kids parking there from the Shoe Game. Why isn't our neighborhood included in any of this report?



**VISUAL SIMULATIONS**  
**25 APRIL 2022**  
Carmel High School Stadium

**CONTENTS:**

- PG-01: CONTENTS
- PG-02: VIEWSHED ANALYSIS AND METHODOLOGY
- PG-03: VISUAL SIMULATION METHODOLOGY
- PG-04: KDP LOCATION MAP
- PG-05: KDP-01 HWY-1 NORTH
- PG-09: KDP-02 MORSE DRIVE
- PG-13: KDP-03 HWY-1 SOUTH
- PG-15: KDP-04 OUTLOOK DRIVE
- PG-19: KDP-05 EDGEFIELD PLACE
- PG-23: KDP-06 CARMEL KNOLLS DR NORTH
- PG-27: KDP-07 CARMEL KNOLLS DR SOUTH
- PG-31: KDP-08 CARMEL RANCHO SHOPPING CENTER
- PG-35: KDP-09 CARMEL MEADOWS

WWW.3DSCAPE.NET



## Response to Letter 14-1-c, Bud Get

1. This comment is about the photos and photo simulation locations in the RDEIR. See response to Letter 14-1-a. Regarding why the area west of State Route 1 was not chosen, the EIR consultants drove the neighborhood to find locations where the stadium area and the trees associated with the stadium area could be seen. Hatton Road, North Mesa Drive, and Ocean Avenue were all reviewed to determine if the project site was visible from these streets. Based upon topography and tree cover, the stadium area and trees were not visible. Therefore, no photos were taken from these locations; however, it is possible that some lighting from the project could be visible from locations west of the highway.

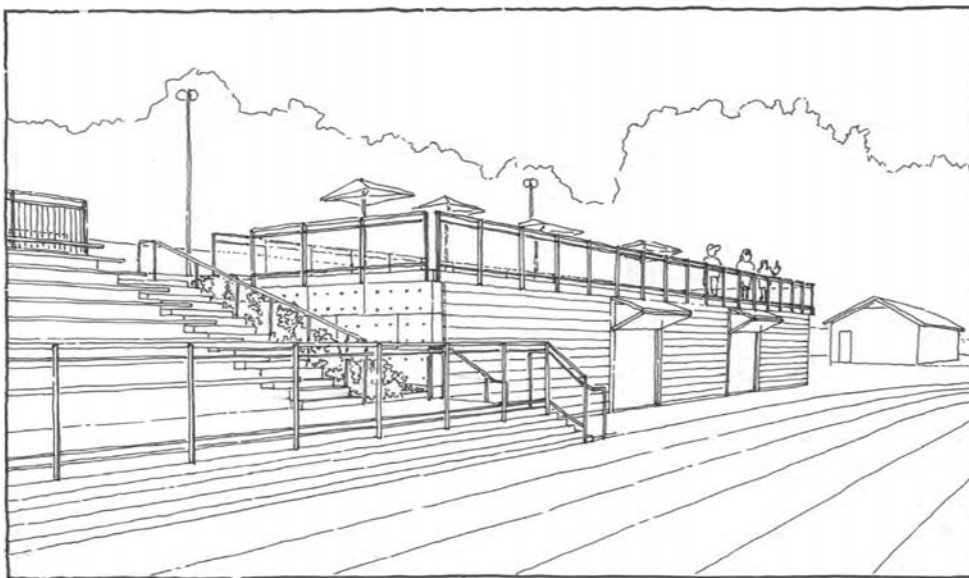
The comment references existing parking conditions at the commenter's home.

Finally, the commenter describes his/her walking routes, and asks "why wasn't our neighborhood included in an of this report." However, the commenter does not indicate where they live. Moreover, in determining whether an environmental impact is significant, "the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons." (*Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 Cal.App.4<sup>th</sup> 357, 376; *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4<sup>th</sup> 477, 493.) No changes to the RDEIR are required.

**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Thursday, September 8, 2022 6:50 AM  
**To:** feedback@carmelunified.org; Teri Wissler Adam  
**Subject:** Re: RDEIR: Comments on all the photos in the report

1 Since I'm on a roll with a second cup of coffee, more ridiculous ideas from your report regarding the hideous viewshet platform transformer concept:

- Why is the source from a 2015 idea? Are you not thinking creatively of the situation now and just sticking in old rejected ideas? Where did this come from?
- Why is it a two level solution? It can't it be a safe one level? What are the guard rails?
- What are the materials?
- If you need more bleachers, why not just make them flat and cohesive with the others?
- Why this location? What could it look like from the visitor side and have thos smaller bleachers placed elsewhere?
- What is the noise level from the platform for the community? Is that a Speaker on the platform as well?
- Design seems ridiculously unsafe. We can't even comment on this, it's just a concept. Aren't we in RDEIR Phase that should have more details?
- Is Dan Paul just pulling out all old ideas and bubble gumming them together? What a waste of my time to review this document if it's rehashing old rejected ideas.
- Was Bartos Architecture paid for this concept under this Scope of Work? When did this work get approved? Can we see the approved contract?
- Why was this not included in the Scoping Session? Why was this not part of the Notice of Preparation? Why include this now?
- Are those two doors swinging open or roll-up? What does the other side look like? How are we supposed to comment on this?



Source: Bartos Architecture 2015

Figure 4-5

Conceptual Storage Building Design

Carmel High School Stadium Improvements Revised Draft EIR

## Response to Letter 14-1-d, Bud Get

1. This comment is about the proposed conceptual storage building design, which the commenter refers to as the “hideous viewshet platform transformer concept.” The commenter asks questions about the design of the building and contract procurement, but does not raise any environmental issues. Therefore, no response is necessary. To the extent this comment seeks information about noise levels, please refer to Section 10, Noise, of the RDEIR. With respect to questions regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16.

**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Thursday, September 8, 2022 7:41 AM  
**To:** feedback@carmelunified.org; Teri Wissler Adam  
**Subject:** Re: RDEIR: Comments on all the photos in the report

1

Okay, on my third cup of coffee:

In the appendix, you have a property spill graphic. Can you provide more information?

Does that green dot mean that is the location of the highest property spill of illuminations? Can we have a KOP from that dot in REAL EVENING CONDITIONS - NOT FAKE DUSK!

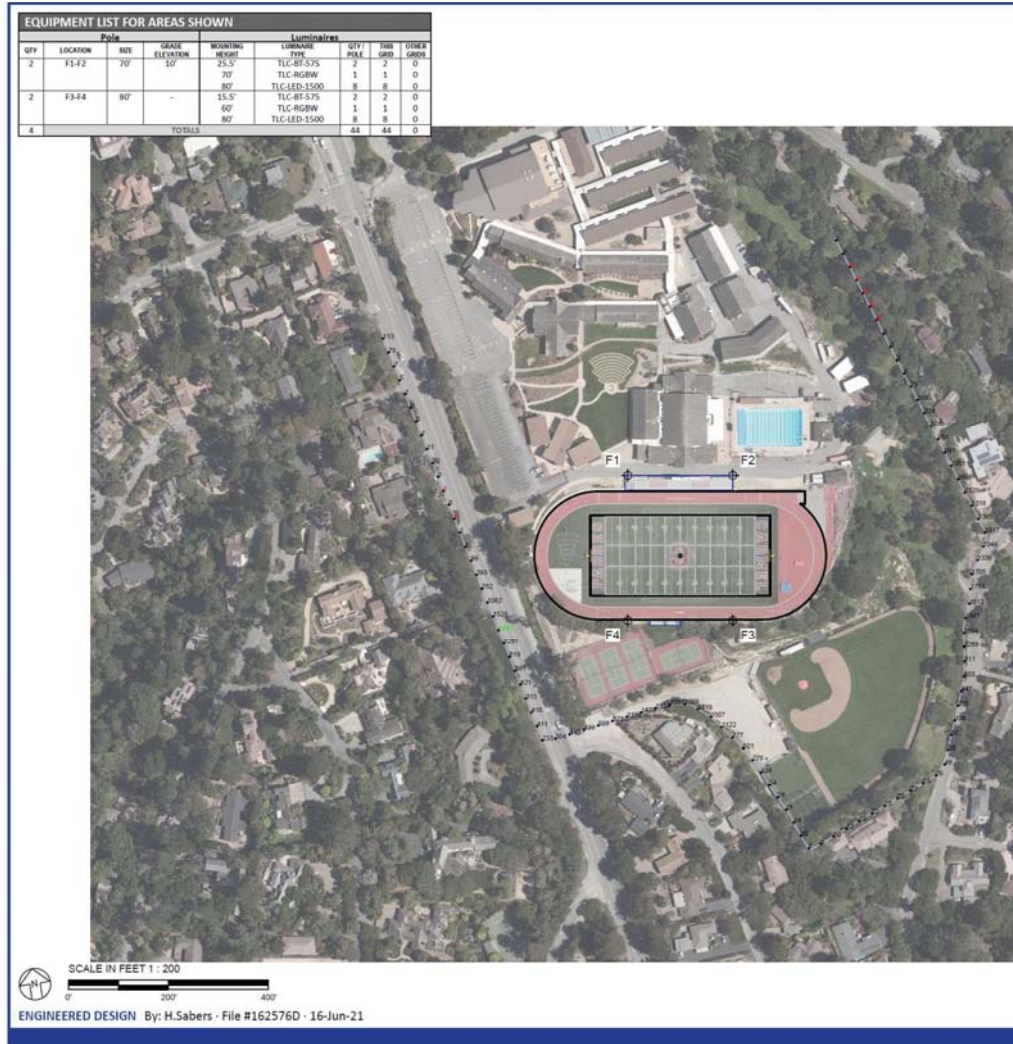
Also, why are those dots only up to the Highway 1 location and surrounding neighborhood on the the east of the campus?

Why are we not seeing the full property spill dots to the broader community?

Why are you not including the west side of Highway 1 in any of your assessments? Where is Carmel-by-the-Sea in this assessment and in all your environment settings?

Why aren't you zooming out to Outlook and Jack's Peak?

What are the property spill numbers in those communities?



## Response to Letter 14-1-e, Bud Get

1. This comment is about an exhibit on page 6 in Appendix C, Lighting Data. The exhibit presents the horizontal footcandles associated with the stadium lights only at the edge of campus. The green number – 0.02 (there is no green dot) represents the maximum illumination at the property boundary. The footcandles at the property boundary range from 0.00 to 0.02. 0.00 represents no illumination. There will be no illumination beyond the campus boundary. See Section 5.0, Aesthetics, of the RDEIR and response to Letter 2c comment 19 for additional information regarding footcandles, as well as candelas, which is a measurement of luminous intensity or brightness as seen from a distance (i.e., from adjacent or neighboring properties).

See also the response to comment Letter 14-1-c regarding the neighborhoods west of State Route 1.

**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Thursday, September 8, 2022 4:59 PM  
**To:** CUSD Feedback  
**Cc:** Teri Wissler Adam  
**Subject:** Re: RDEIR: Comments on all the photos in the report

1 A few follow-up as I continue to read more:

This page says you will only use the lights for 44 games but that completely conflicts with the number on page 103 which sound like hundreds. An instagram account says it's like 400 practices and 124 games?

**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.

## Response to Letter 14-1-f, Bud Get

1. Regarding the number of days the lights would be on, see response to Letter 2b, comment 2.

Regarding the post to “an Instagram account,” it is unclear what source the comment refers to as neither the school district nor the high school have posted this information to their Instagram accounts.



**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Friday, September 9, 2022 6:30 AM  
**To:** CUSD Feedback; Teri Wissler Adam  
**Subject:** RDEIR: More Comments as of 9/9 (Please Capture)

1 Here are more comments since the report is pretty long and I can only try to read sections before work. The pine article quote was correct "no more organization than a neatly shuffled deck of cards", so why don't you organize the next version better? Why didn't you insert page names on each page? Why don't you include the page numbers in the table of content? Why do you insert pictures, figures in the middle with no logic? Why don't you hyperlink the cross-references - welcome to the modern day world of digital technology.

2 Why are you demolishing the tennis courts?  
Can you be more specific on what is wrong with them? Seems like simple fixes would keep them intact.  
How much would it cost to fix these courts?  
What is the cost to fix the tennis court vs. building new ones at CMS? Without that comparison how can decision makers know what is best?

3 Why aren't there any costs associated with any of these projects? Don't the decision-maker's need in order to make good decisions on trade-offs and considerations? You mentioned meeting budget was an objective so shouldn't that include more details?

4 Do you need more parking for the athletic fields? It's unclear what you are trying to solve? T  
Why isn't the baseball field up for grabs in re-design and consideration? The scope is now "stadium athletic Improvements" - the field is connected to the stadium as much as the swimming pool?  
How many games a year do the baseball students play?  
Will the baseball players need lights as well?  
Why isn't the baseball team part of the scheduling and field discussions? Can we see that inserted into all of the sections where the other athletes are discussed? Perhaps Baseball fields should be demolished and relocated to the CMS? Can you provide insights?

Also, the whole neighborhood knows the batting cages were illegally installed with no process. You have to release the information through the CPRA process. You can't go to final RDEIR without showing if the board approved more traffic going down there, would the environment impact be greater, etc Was a Notice of Exemption filed?  
Can you measure that road opening at the top of the baseball field for us? Does that meet fire code compliance if you were to continue building out the campus?

5 Also, we walked the baseball field last night, it's part of an open public space enjoyed by the neighborhood. Wouldn't we see the stadium lights from there? In the day and then at night? Can we have KOPs?

6 Also, why isn't there consideration to build a walkway-up from the baseball field to the stadium? That new four foot sidewalk seems dangerous - why not fix the backside walk-up that exists?  
There is an old staircase/walkway that looks like it's not repaired and dangerous? Can you fix that as part of parking solutions?

7 Photo below show the "gate" at the baseball field that is a choking point for emergency vehicles? Can you clarify how that juncture fits into the overall safety of the design you are presenting?  
Also, you do show that Cal-Trans has the right-of-way at the intersection of Highway 1 and Morse but that is very dangerous. Why is another entrance/exit from the "new parking" safe to introduce more traffic at that limited intersection? What safety measure should you be showing us before anything is approved? Looks like you want us to say the plans are safe without you having done any real homework.

Thank you have a nice day.



## Response to Letter 14-1-g, Bud Get

1. This comment is about the contents of the RDEIR. The RDEIR was prepared according to the requirements of CEQA and the CEQA Guidelines. Regarding page names, every section of the RDEIR is named based upon the topic. The section name is also presented in the header of every even page, and the title of the RDEIR is presented in the header of every odd page. The Table of Contents includes page numbers for each Section, Figure, and Table, and includes a list of all Appendices. The figures are presented on the next odd-numbered page after their first reference in the text. Regarding “hyperlink,” CEQA does not require web sources be hyperlinked; however, the web sources presented in Section 20.0, Document and Web Sources and Report Preparers, of the RDEIR were hyperlinked. This comment does not raise an environmental issue and therefore, no further response is necessary.
2. The tennis courts are proposed to be replaced with additional on-campus parking. In response to public comments on the original DEIR received during the original public comment period, the school district expanded the scope of the project to address raised concerns. Additional on-campus parking was requested by members of the public. The school district is proposing to hold tennis practices at the existing Carmel Middle School tennis courts. This comment does not raise an environmental issue and therefore, no further response is necessary.
3. Project costs are not an environmental issue and therefore, are not addressed in an EIR. The purpose of an EIR is to provide public agencies and the public with detailed information about the effect that a proposed project is likely to have on the *environment*. This comment does not raise an environmental issue and therefore, no further response is necessary. In general, more information on projected costs may be found in the 2019 *Carmel Unified School District Facilities Master Plan*. Please refer to page 18-18 of the RDEIR for more information and a link thereto, or response to Letter 14-1-p.
4. Changes to the baseball field are not included in the project description. The commenter also discusses the existing setting at the baseball facility. Previous projects and alleged issues associated with the batting cages and baseball field are not the subject of the RDEIR, and are outside the scope of this environmental analysis under CEQA. This Final EIR addresses comments on the RDEIR and does not apply to previous projects. This comment does not raise an environmental issue about the proposed project and therefore, no further response is necessary.

To the extent the comment is suggesting that the RDEIR should have included demolition of the baseball field and relocation to Carmel Middle School as a Project Alternative, such alternative would not be feasible as the baseball and softball fields at Carmel Middle School are currently already used by Carmel High School’s JV and varsity softball teams. (See

Table 3-4 of RDEIR). Moreover, because many of Carmel High School's sports teams must share the existing stadium field, the baseball field is regularly utilized for practice by the high school's football, field hockey and soccer teams. As stated in Section 15126.6 of the CEQA Guidelines, "An EIR need not consider every conceivable alternative to the project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible... There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." Likewise, such alternative would not offer significant environmental advantages in comparison with the project or with the alternatives that are presented in the RDEIR. (14 Cal. Code Regs. §15126.6(b); *Tracy First v. City of Tracy* (2009) 177 Cal.App.4<sup>th</sup> 912.) No changes to the RDEIR are needed. Please also refer to response to Letter 14-2-o, comment 2.

5. Regarding the methodology of the visual assessment and the choice of Key Observation Points, see response to Letter 2b, comment 2. The commenter also states that the baseball field is "part of an open public space enjoyed by the neighborhood." However, the baseball field is part of the Carmel High School campus, which is owned and operated by the district for the district's educational and athletic programs. While the baseball field may be utilized by the public in accordance with the Civic Center Act when not in use for school purposes, those wishing to enter district grounds must do so in accordance with applicable law and Board Policy. No changes to the RDEIR are needed.
6. See response to comment 4 above. The commenter also references an "old staircase/walkway", but does not specify its location. In general, pathway replacement work within the scope of the proposed Project is discussed on page 4-21 and depicted on Figure 4-10 of the RDEIR. To the extent this reference concerns another pathway, such improvement is outside the scope of the proposed Project and RDEIR. This Final EIR only addresses comments on the RDEIR and the environmental effects of the proposed project. No further response is needed.
7. The commenter seeks information regarding the "gate" at the baseball field. Changes to the baseball field are not included in the project description. The commenter also seeks information regarding the safety of the intersection of State Route 1 and Morse Drive and states this intersection is "very dangerous," but the commenter does not provide evidence of existing or future safety issues at this intersection. Hexagon Transportation Consultants (RDEIR Appendix J) reviewed the vicinity and on-campus access and circulation and concluded that with implementation of the Traffic Management Plan, traffic operations would work acceptably. Any perceived safety impacts would be mitigated by implementation of the Traffic Management Plan. Please refer to Section 11.0, Transportation and Parking, of the RDEIR for additional discussion.

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**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Friday, September 9, 2022 6:37 AM  
**To:** CUSD Feedback  
**Cc:** Teri Wissler Adam  
**Subject:** RDEIR: Biological Resources (questions on 9/9)

- 1 | On the page below (365), you reference a report but we don't see this in the appendix for verification. Can you include that?
- 2 | If CMS has the potential to show a California red-legged frog what doesn't the CHS site have a similar chance? What don't you include that in the Risks and Mitigation? That is SERIOUS! You are severely underestimating the biological resources as "not significant" but building up a case that you can't use CMS as a viable alternative. Please be consistent in the application of measurements.
- 3 | What is a MND and why hasn't one been included for CHS to compare?
- 4 | PAGE 365: A 2018 IS/MND prepared for the acquisition of the 8.23-acre parcel immediately adjacent to and west of Carmel Middle School to use for an additional athletic field, identified the following species as having the potential to occur in the vicinity of the middle school site: California red-legged frog (*Rana draytonii*), California tiger salamander (*Ambystoma californiense*), Monterey dusky-footed woodrat (*Neotoma macrotis luciana*), Townsend's big-eared bat (*Corynorhinus townsendii*), and nesting birds (EMC Planning Group 2018). Biological mitigation measures were identified in the 2018 IS/MND which addressed protection of California red-legged frog and California tiger salamander along with portable lights



## Response to Letter 14-1-h, Bud Get

1. The commenter is referring the page 365 of the RDEIR PDF, which is page 18-25 in the Alternatives section in the RDEIR. This reference in the text, EMC Planning Group 2018, is sourced in Section 20.0, Document and Web Sources and Report Preparers, of the RDEIR. The source is as follows, and was available before and during the public review period, as is still available: EMC Planning Group. August 31, 2018. *Carmel Unified School District Site Acquisition Proposed Mitigated Negative Declaration*. Monterey, CA. Available online at: [www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/1/CUSD\\_Site%20Acquisition\\_MND\\_IS.pdf](http://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/1/CUSD_Site%20Acquisition_MND_IS.pdf)
2. Regarding the California red-legged frog, qualified biologists evaluated both the Carmel High School site (2021 and 2022) and the Carmel Middle School site (2018). The biologists concluded that California red-legged frog habitat is not located in the vicinity of the high school, including Hatton Canyon adjacent to the high school. The biologists also concluded that there is California red-legged frog habitat in the vicinity of the middle school, due to the proximity of the Carmel River. The RDEIR does not underestimate the biological resources in the vicinity at either school, and does not advocate for or against the viability of a proposed project or the alternatives, but does identify the environmental impacts associated with the proposed project and the alternatives studied in the RDEIR. Please refer to page 18-25 of the RDEIR of the RDEIR for further discussion. No changes to the RDEIR are necessary.
3. A “MND” is a mitigated negative declaration, which is also an environmental document prepared pursuant to CEQA in lieu of an EIR, negative declaration (ND), or Notice of Exemption. A mitigated negative declaration is a study that concludes there would not be a significant impact on the environmental with implementation of a project as mitigated, and therefore further concludes that preparation of an EIR is not required. The proposed project did not qualify for a mitigated negative declaration, as the proposed project would result in significant and unavoidable impacts. Therefore, an EIR was required and prepared.
4. The commenter misquotes text on page 18-25 in the Alternatives section in the RDEIR, “along with portable lights.” The actual words in this text are “along with woodrats, bats, and nesting birds.” No changes to the RDEIR are necessary.

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**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Friday, September 9, 2022 6:45 AM  
**To:** CUSD Feedback; Teri Wissler Adam  
**Subject:** Re: RDEIR: Comments on all the photos in the report

1

Why is it that the school district does not have any policies associated with the construction of athletic Facilities?  
Does the school district have any policies associated with any construction on the school campuses?  
How does the school identify the parking needs and emergency routes on the campus?

You mention this below. Can we see a copy of the details of this reference as an appendix?

*The school district's governing board does have policies that govern the use of school facilities, including athletic facilities, by community groups consistent with the Civic Center Act (Ed. Code, section 38130, et seq.; see BP & AR 1330.).*



## Response to Letter 14-1-i, Bud Get

1. The commenter acknowledges text in the RDEIR about school district policies, but does not raise an environmental concern. Therefore, no response is necessary. In general, Board Policies and Administrative Regulations may be found on the district's Board website: (<https://www.carmelunified.org/Page/6033>.)

**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Friday, September 9, 2022 7:13 AM  
**To:** CUSD Feedback; Teri Wissler Adam  
**Subject:** RDEIR: Comments

APPENDIX B: NEIGHBORHOOD PARKING ASSESSMENT

1 You said:

This assessment evaluates the availability of public parking in the neighborhoods surrounding Carmel High School (project site) located between State Route 1 (west) and Hatton Canyon (east). ***These results are intended to be utilized by the Carmel Unified School District (school district) to develop a baseline understanding of the parking conditions in the surrounding neighborhoods in an effort to better inform the Revised Draft EIR analysis.***

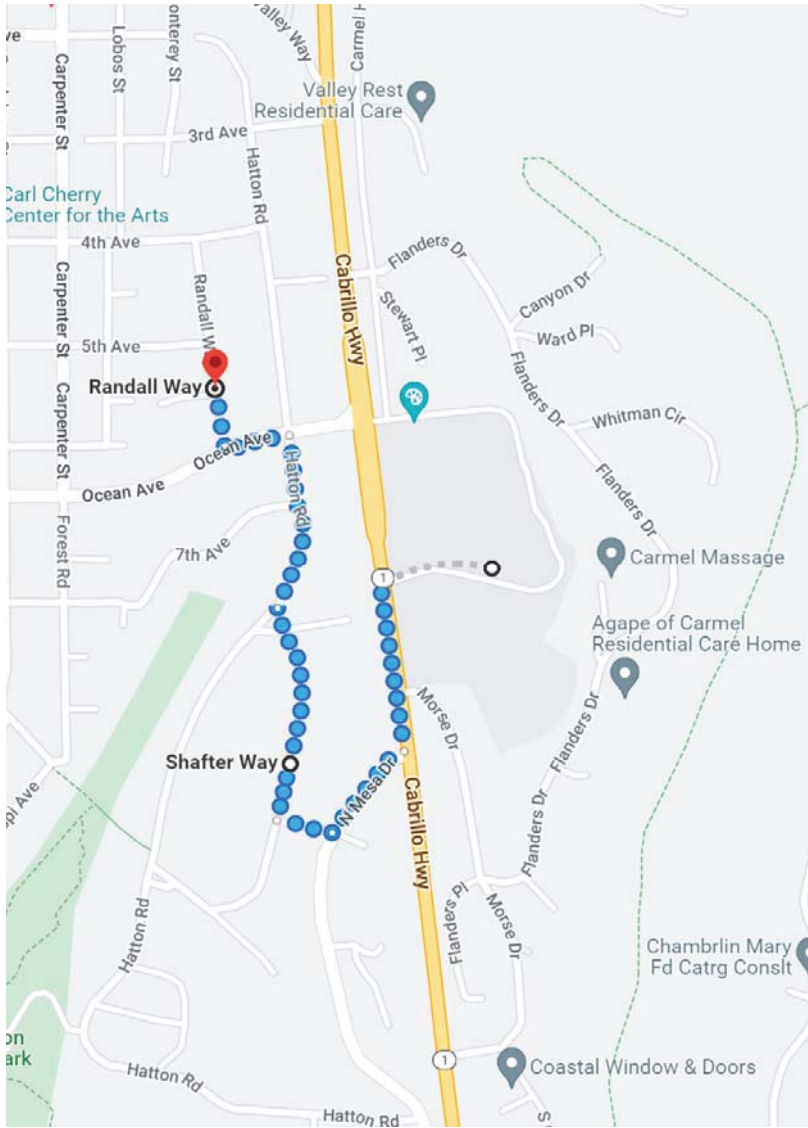
This baseline is not accurate. You only got 1/2 of the circle. The school sits in the center of the Carmel and Carmel-by-the-Sea city and you must evaluate it as a whole circle since the parking on the other side of Highway is a mess as well. This project will have an environmental impact to the streets of:

- Hatton Road
- Shafter Way
- Randal way
- Mess Drive

They are all the same distance and are used as parking overflow flow as much as the ones you've identified. As residents, our streets were FLOODED with kids parking here on all foot ball games AND ridiculous during the Shoe Game. Very irresponsible to note consider this part of the scope.

You must also speak to the dangers of the crossings and lack of no sidewalks! People were parking on Hatton Road for the athletic games and there was NO pedestrian walkway to get to Hatton safely. Many pedestrians were crossing with NO walkway.

1  
cont.



## Response to Letter 14-1-j, Bud Get

1. See response to Letter 2b, comment 3.

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**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Friday, September 9, 2022 7:16 AM  
**To:** CUSD Feedback; Teri Wissler Adam  
**Subject:** Re: RDEIR: Comments

1

No safe walkway from Randall Way to get to cross-light. Why are you not including this in your assessment? Same distance from the HIGH School and people sneak park here and cause a huge safety issue.



## Response to Letter 14-1-k, Bud Get

1. The commenter expresses a safety concern for people parking on Randall Way. The proposed project includes the addition of 111 new on-campus parking spaces. See Section 11.0, Transportation and Parking, of the RDEIR, as well as response to Letter 2b, comment 3, regarding implementation of a Traffic Management Plan for highly-attended events.

Regarding existing perceived safety issues regarding walking in the neighborhoods, the Monterey County Sheriff's office and the California Highway Patrol were contracted regarding the history of accidents in the neighborhoods surrounding the high school campus (north, south, east, and west), as well as for State Route 1 in the immediate vicinity of the campus. The Sheriff's office referred us to the CHP, and the CHP referred us to the Transportation Injury Mapping System (TIMS) website <https://tims.berkeley.edu/>. The accident history is attached to this response.

In the neighborhoods, 11 incidents were recorded between 2011 and 2021, which was the most recent data provided. One involved a pedestrian and one involved a bicycle. No deaths were reported; however, at least one injury was reported with every incident. There is no indication in the data that walking, biking, or driving in the neighborhoods surrounding the high school campus should be considered dangerous.

On State Route 1, between Flanders Drive (north of Carmel High School) and S. Carmel Hills Drive (south of Carmel High School), 88 incidents were recorded between 2011 and 2021, which was the most recent data provided. Two incidents included pedestrians and two incidents included bicycles. One death was reported, which involved a pedestrian. See Letter 14-5-e regarding additional information regarding this incident. At least one injury was reported with every other incident.

## ACCIDENT HISTORY IN THE NEIGHBORHOODS SURROUNDING CARMEL HIGH SCHOOL (BOTH EAST AND WEST OF, BUT NOT INCLUDING STATE ROUTE 1

The following information (11 plots) is from the Transportation Injury Mapping System (TIMS) website <https://tims.berkeley.edu/>. These 11 accidents represent the recorded accident history in the neighborhoods surrounding Carmel High School (both east and west of, but not including State Route 1) between 2011 to 2021, with 2021 data subject to be updated per the website.

### Plot #1

Date & Time	2/20/2011 18:20
Location	Flanders Dr & Row Pl
Intersection	No
Dist. & Dir. from intersection	900.00 ft North
Crash Severity	4 - Injury (Complaint of Pain)
Injuries	0 Killed & 2 Injured
Type of Crash	E - Hit Object
Involved With	I - Fixed Object
Pedestrian Involved	No
Bicycle Involved	No

### Plot #2

Date & Time	11/9/2020 09:37
Location	N Carmel Hills Drive & Stewart Place
Intersection	No
Dist. & Dir. from intersection	163.00 ft South
Crash Severity	2 - Injury (Severe)
Injuries	0 Killed & 1 Injured
Type of Crash	B - Sideswipe
Involved With	J - Other Object
Pedestrian Involved	Yes
Bicycle Involved	No

### Plot #3

Date & Time	1/31/2020 15:11
Location	Ocean Ave & Sr-1
Intersection	No
Dist. & Dir. from intersection	100.00 ft West
Crash Severity	4 - Injury (Complaint of Pain)
Injuries	0 Killed & 2 Injured
Type of Crash	C - Rear End
Involved With	C - Other Motor Vehicle
Pedestrian Involved	No
Bicycle Involved	No



**Plot #4**

Date & Time	3/21/2016 07:35
Location	Ocean Ave & Hatton Rd
Intersection	No
Dist. & Dir. from intersection	100.00 ft East
Crash Severity	4 - Injury (Complaint of Pain)
Injuries	0 Killed & 4 Injured
Type of Crash	C - Rear End
Involved With	C - Other Motor Vehicle
Pedestrian Involved	No
Bicycle Involved	No

**Plot #5**

Date & Time	8/4/2017 18:02
Location	Hatton Rd & Ocean Ave
Intersection	Yes
Dist. & Dir. from intersection	At Intersection
Crash Severity	4 - Injury (Complaint of Pain)
Injuries	0 Killed & 3 Injured
Type of Crash	D - Broadside
Involved With	C - Other Motor Vehicle
Pedestrian Involved	No
Bicycle Involved	No

**Plot #6**

Date & Time	8/7/2014 16:40
Location	Ocean Av & Hatton Av
Intersection	Yes
Dist. & Dir. from intersection	At Intersection
Crash Severity	4 - Injury (Complaint of Pain)
Injuries	0 Killed & 1 Injured
Type of Crash	D - Broadside
Involved With	C - Other Motor Vehicle
Pedestrian Involved	No
Bicycle Involved	No

**Plot #7**

Date & Time	5/1/2019 15:30
Location	Hatton Road & Ocean Avenue
Intersection	No
Dist. & Dir. from intersection	10.00 ft South
Crash Severity	4 - Injury (Complaint of Pain)
Injuries	0 Killed & 1 Injured
Type of Crash	D - Broadside
Involved With	G - Bicycle
Pedestrian Involved	No
Bicycle Involved	Yes

**Plot #8**

Date & Time	9/27/2013 14:22
Location	Ocean Av & Hatton Rd
Intersection	Yes
Dist. & Dir. from intersection	At Intersection
Crash Severity	4 - Injury (Complaint of Pain)
Injuries	0 Killed & 2 Injured
Type of Crash	D - Broadside
Involved With	C - Other Motor Vehicle
Pedestrian Involved	No
Bicycle Involved	No

**Plot #9**

Date & Time	1/29/2015 18:35
Location	Hatton Rd & 7th Av
Intersection	No
Dist. & Dir. from intersection	16.00 ft South
Crash Severity	4 - Injury (Complaint of Pain)
Injuries	0 Killed & 1 Injured
Type of Crash	C - Rear End
Involved With	E - Parked Motor Vehicle
Pedestrian Involved	No
Bicycle Involved	No

**Plot #10**

Date & Time	8/22/2013 14:18
Location	7th Av & Hatton Rd
Intersection	Yes
Dist. & Dir. from intersection	At Intersection
Crash Severity	3 - Injury (Other Visible)
Injuries	0 Killed & 1 Injured
Type of Crash	D - Broadside
Involved With	C - Other Motor Vehicle
Pedestrian Involved	No
Bicycle Involved	No

**Plot #11**

Date & Time	3/16/2015 16:45
Location	N Mesa Dr & Hatton Rd
Intersection	Yes
Dist. & Dir. from intersection	At Intersection
Crash Severity	3 - Injury (Other Visible)
Injuries	0 Killed & 1 Injured
Type of Crash	H - Other
Involved With	G - Bicycle
Pedestrian Involved	No
Bicycle Involved	Yes

## ACCIDENT HISTORY ON STATE ROUTE 1

The following information is the reported accident history for the 88 total incidents that occurred on State Route 1 between the boundaries of Flanders Drive (north of Carmel High School) and S. Carmel Hills Drive (south of Carmel High School) from 2011 through 2021, with 2021 data subject to be updated per the website.

YEAR	PRIMARY RD	SECONDARY RD	NUMBER KILLED	NUMBER INJURED	PARTY COUNT	PEDESTRIAN ACCIDENT	BICYCLE ACCIDENT
2011	RT 1	CARMEL HILLS DR	0	1	3		
2011	RT 1	MESA DR	0	1	2		
2011	RT 1	OCEAN AV	0	1	2		
2011	RT 1	S CARMEL HILLS DR	0	2	4		
2012	RT 1	MORSE DR	0	3	2		
2012	RT 1	S CARMEL HILLS DR	0	2	4		
2012	RT 1	FLANDERS DR	1	0	2	Y	
2012	RT 1	MESA DR	0	1	2		
2012	RT 1	OCEAN AV	0	1	4		
2012	RT 1	MESA DR	0	4	3		
2012	RT 1	MORSE DR	0	2	2		
2012	RT 1	OCEAN AV	0	1	2		
2012	RT 1	MORSE DR	0	1	2		
2012	RT 1	MORSE DR	0	2	3		
2013	RT 1	OCEAN AV	0	1	1		
2013	RT 1	OCEAN AV	0	1	1		
2013	RT 1	OCEAN AV	0	2	3		
2013	RT 1	MORSE DR	0	1	1		
2013	RT 1	MORSE DR	0	1	3		
2013	RT 1	CARMEL HILLS DR	0	1	2		
2013	RT 1	MESA DR	0	2	2		
2013	RT 1	MORSE DR	0	2	2		
2014	RT 1	OCEAN AV	0	1	2		
2014	RT 1	CARMEL VALLEY RD	0	1	2		
2014	RT 1	MESA DR	0	1	2		
2014	RT 1	FLANDERS DR	0	1	2		
2014	RT 1	MESA DR	0	2	2		
2014	RT 1	MORSE DR	0	3	2		
2014	RT 1	MESA DR	0	1	2		
2015	RT 1	FLANDERS DR	0	1	2		
2015	RT 1	OCEAN AV	0	1	1		
2015	RT 1	FLANDERS DR	0	1	3		
2015	RT 1	MESA DR	0	1	2		
2015	OCEAN AV	RT 1	0	1	2		
2015	RT 1	MORSE DR	0	2	3		
2015	RT 1	MORSE DR	0	2	3		
2015	RT 1	CARMEL HILLS DR	0	1	1		

YEAR	PRIMARY RD	SECONDARY RD	NUMBER KILLED	NUMBER INJURED	PARTY COUNT	PEDESTRIAN ACCIDENT	BICYCLE ACCIDENT
2015	RT 1	FLANDERS DR	0	1	2		
2015	RT 1	OCEAN AV	0	2	2		
2015	RT 1	MESA DR	0	1	2		
2015	RT 1	OCEAN AV	0	1	3		
2015	SR-1	FLANDERS DRIVE	0	1	4		
2015	SR-1	MORSE DRIVE	0	1	1		
2015	SR-1	S. CARMEL HILLS DR.	0	3	5		
2016	SR-1	OCEAN AVE	0	1	2		
2016	SR-1	SOUTH CARMEL HILLS DRIVE	0	1	3		
2016	SR-1	MESA DRIVE	0	1	1		
2016	SR-1	MESA DRIVE	0	1	2		
2016	SR-1 N/B	FLANDERS DR.	0	1	2		
2016	SR-1 N/B	FLANDERS DRIVE	0	2	2		
2017	SR-1	MORSE DRIVE	0	1	2		
2017	SR-1	OCEAN AVE	0	1	1		
2017	SR-1	OCEAN AVENUE	0	1	1		
2017	SR-1	OCEAN AVENUE	0	3	2		
2017	SR-1 S/B	OCEAN AVE.	0	1	2		
2017	SR-1	OCEAN AVE.	0	2	3		
2017	SR-1	OCEAN STREET	0	1	3		
2017	SR-1	CARMEL HILLS DRIVE	0	1	2		
2018	SR-1 (S/B)	MESA DR	0	1	2		
2018	SR-1 S/B	OCEAN AVENUE	0	1	2		
2018	SR-1	MORSE DR	0	1	3		
2018	SR-1 S/B	OCEAN AVENUE	0	1	2		Y
2018	STATE ROUTE 1	OCEAN AVE.	0	2	1		
2018	SR-1 N/B	OCEAN AVENUE	0	1	2		
2018	SR-1	MESA ROAD	0	1	4		
2018	SR-1 S/B	OCEAN AVENUE	0	1	3		
2018	SR-1 NORTHBOUND	CARMEL HILLS DRIVE	0	1	3		
2018	SOUTHBOUND SR-1	OCEAN AVENUE	0	3	4		
2019	NORTHBOUND SR-1	MESA ROAD	0	1	4		
2019	SR-1 SOUTHBOUND	MORSE DRIVE	0	3	2		
2019	OCEAN AVE. E/B	SR-1	0	1	2		
2019	SR-1 SOUTHBOUND	NORTH MESA DRIVE	0	1	3		
2019	SR-1 SOUTHBOUND	OCEAN AVE	0	1	2		
2019	SR-1	N. MESA DRIVE	0	2	2		
2019	SR-1	MORSE DR	0	1	2		

YEAR	PRIMARY RD	SECONDARY RD	NUMBER KILLED	NUMBER INJURED	PARTY COUNT	PEDESTRIAN ACCIDENT	BICYCLE ACCIDENT
2019	SR-1	S CARMEL HILLS DR.	0	1	2		
2019	SR-1	OCEAN AVE	0	1	3		
2019	SR-1	SOUTH CARMEL HILLS DRIVE	0	3	2		
2020	SR-1	OCEAN AVENUE	0	1	2	Y	
2020	SR-1	OCEAN AVENUE	0	1	2		
2020	SOUTHBOUND SR-1	OCEAN AVENUE	0	3	2		
2020	SR-1	MESA DRIVE	0	2	2		
2020	SR-1 N/B	OCEAN AVE	0	1	2		Y
2020	SR-1	OCEAN AVENUE	0	1	2		
2021	SR-1 SOUTHBOUND	OCEAN AVENUE	0	1	3		
2021	SR-1	OCEAN AVENUE	0	1	3		
2021	STATE ROUTE 1 (SR-1)	MORSE DRIVE	0	1	2		
2021	OCEAN AVENUE / SR-1	OF SR-1	0	1	2		

**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Friday, September 9, 2022 7:18 AM  
**To:** CUSD Feedback; Teri Wissler Adam  
**Subject:** Re: RDEIR: Comments

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NO SAFE Crossways from HATTON ROAD ON THE LEFT SIDE To GET TO THE LIGHT TO ATTEND GAMESQQ



## Response to Letter 14-1-l, Bud Get

1. The commenter expresses a safety concern for people parking on Hatton Road. The proposed project includes the addition of 111 new on-campus parking spaces. See Section 11.0, Transportation and Parking, of the RDEIR, as well as response to Letter 2b, comment 3, regarding implementation of a Traffic Management Plan for highly-attended events.

See also Response to Letter 14-1-k.

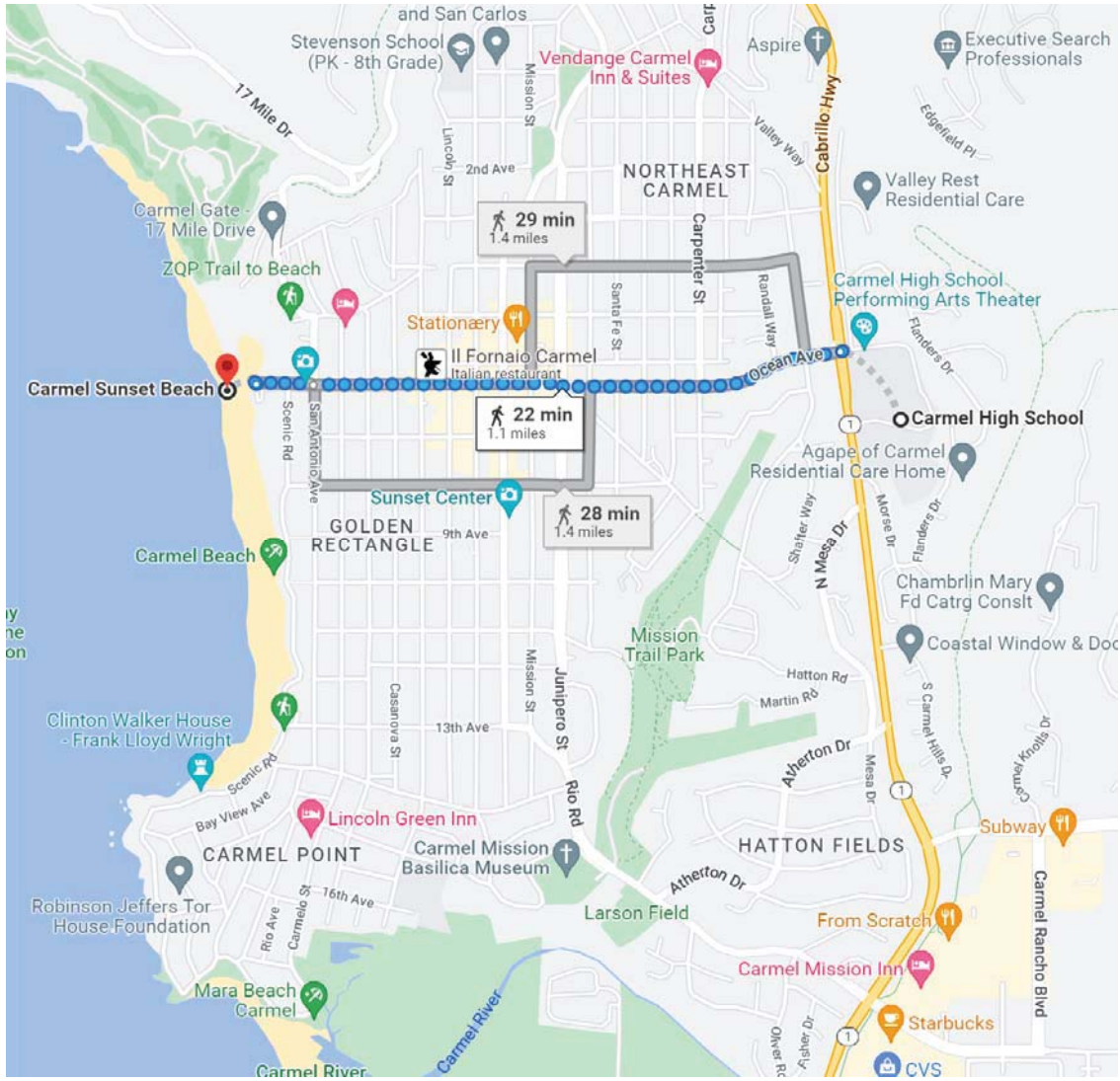


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**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Friday, September 9, 2022 7:36 AM  
**To:** CUSD Feedback; Teri Wissler Adam  
**Subject:** Re: RDEIR: Comments

- 1 | For parking, safety and traffic mitigation, you missed including everything on the other side of Highway 1:
  - Other than the traffic light and cross-road across highway 1, what other safety measures will you put in place for everyone trying to cross the highway once they've parked on Hatton, Randall and Shafter Way?
- 2 | - Should there be two cross-roads on Highway 1? Is this something you should be clear to Caltrans and TAMC about? Which of the agencies would monitor this and hold you accountable for traffic, parking and safety measures?
- 3 | - Should side-walks be installed on both sides of Ocean Ave? Are other pedestrian markings needed?
  - Why aren't there school crossing signs for the students on a daily basis - there are alot of students that walk to school from that side?
- 4 | - CUSD serves Carmel-by-Sea and their kids, why isn't CBTS park this assessment in a more meaningful way especially in the Environment Sections?
- 5 | - It's less than 1 mile from the Ocean to High School, kids walk to school all the time. Installing Stadium lights would increase attendance (you said by 60%), why wouldn't the whole area that CHS serves not be part of the parking assessment? Even the board members and their kids live walking distance from the school. How do you plan on managing everyone crossing Highway 1 to attend the games? Where is their parking assessment, available parking, restricted, etc?
  - Please be honest and map out the walking distant regions of the geographical areas the school serves and assess them in the same way. Seriously, take an accurate picture of the whole area not one tiny point that is not relevant. THIS is more accurate of the environmental impact you are bringing on the neighborhood!

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## Response to Letter 14-1-m, Bud Get

1. The commenter expresses a safety concern for people parking on Hatton, Randall, and Shafter Way. The proposed project includes the addition of 111 new on-campus parking spaces. See Section 11.0, Transportation and Parking, of the RDEIR, as well as response to Letter 2b, comment 3, regarding implementation of a Traffic Management Plan for highly-attended events. See also Response to Letter 14-1-k. No changes to the RDEIR are required.
2. The comment asks, “Should there be two cross-roads on Highway 1” and who should monitor this? The comment is not clear and does not appear to raise an environmental issue. Therefore, no further response is required.
3. Regarding sidewalks on both sides of Ocean Avenue and other pedestrian markings, the commenter provides no evidence for these improvements. The proposed project does not include sidewalks on both sides of Ocean Avenue and other pedestrian markings, and none are required associated with the proposed project. See Section 11.0, Transportation and Parking of the RDEIR. No changes to the RDEIR are required.
4. The commenter asks, “CUSD serves Carmel-by-Sea [sic] and their kids, why isn’t CBTS park [sic] this assessment in a more meaningful way especially in the Environment Sections?” The comment is not clear and does not appear to raise an environmental issue. Therefore, no further response is required.
5. Regarding the parking assessment, the scope of the assessment was based upon neighbors in the adjacent neighborhoods east of the highway expressing concerns about students and high school visitors parking in the neighborhood. Regarding crossing the highway, there is a traffic signal and crosswalk at State Route 1 and Ocean Avenue. This is how students currently cross the highway, and how they will continue to cross the highway after implementation of the project.

**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Friday, September 9, 2022 7:43 AM  
**To:** CUSD Feedback; Teri Wissler Adam  
**Subject:** Re: RDEIR: Comments

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Please include accurate photos of the conditions that will happen at the intersection of Highway 1 and cross-roads to CHS during these games. Why didn't you include:

SINGULAR CROSS WALK.



VERY SCAREY RIGHT TURN with no sidewalk off of Randall? Why not this in the assessment? Visitors will and have always been parking on the other side of Highway 1 for games. This must be part of your environment impact report as you squeeze the other side.





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## Response to Letter 14-1-n, Bud Get

1. The proposed project does not include, nor require off-site improvements in the Caltrans right-of-way at the intersection of State Route 1 and Ocean Boulevard, the main entrance to the high school. No changes to the RDEIR are necessary. Please see response to Letter 14-1-m, above.

**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Friday, September 9, 2022 7:46 AM  
**To:** CUSD Feedback; Teri Wissler Adam  
**Subject:** Re: RDEIR: Comments on all the photos in the report

1 Continued photos of Highway 1 on the West Side showing no sidewalks or safe crossing conditions as people park on Hatton Road for the increased attendance and impact report.

How are you address all the safety, parking, traffic conditions you will be impacting on the environment on the other side of Highway 1 for the residents and ALL of Carmel-by-the-Sea?





## Response to Letter 14-1-o, Bud Get

1. The commenter expresses a safety concern for people parking on Hatton Road and all of Carmel-by-the Sea. The proposed project includes the addition of 111 new on-campus parking spaces. See Section 11.0, Transportation and Parking, of the RDEIR, as well as response to Letter 2b, comment 3, regarding implementation of a Traffic Management Plan for highly-attended events.

See also Response to Letter 14-1-k and 14-1m.

**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Saturday, September 10, 2022 4:13 AM  
**To:** CUSD Feedback; Teri Wissler Adam  
**Subject:** RDEIR: Comments and Contradictions

1 **Master Planning at Carmel Middle School (Page 358)**

- You have contradicting statements of future planning and potential and at the same time a "not possible" attitude?

**You State: In 2011, the school district studied constructing a stadium complex at Carmel Middle School, but the space required to accommodate such a stadium was determined to be infeasible given space requirements.**

- Where is that plan? Is there a concept? Can the public see that? Why was that not included for review for us to objectively assess the opportunity?

2 **You State: The estimated cost in 2011 was \$24 million.**

- You include the cost of the "stadium complex" here but leave out what it entails?  
- Why not provide head-to-head comparisons of this CMS plan to CHS Plan? You don't even reveal costs of the CHS plan? Where is that?

3 **You State: Subsequently, the school district acquired the adjacent, undeveloped property and in 2019, prepared the Carmel Unified School District Facilities Master Plan (2019 master plan) which provided for a revision of the Carmel Middle School campus athletic facilities to maximize outdoor learning and playfields for all students across the school district.**

- Your purchase of the land and the Facilities Master Plan show the potential of the fields, why purchase if not feasible?  
- Can you isolate one field down for a football field with stadium lights?

4 **This revision included the potential for up to six baseball or softball diamonds, two soccer fields, a lighted outdoor track and football field, four outdoor basketball courts, eight tennis courts spread across the extent of the existing middle school campus (see Figure 5.9 of the 2019 Master Plan, included as Figure 18-4, Carmel Middle School Proposed Master Plan Diagram (2019 Facilities Master Plan)).**

- Why is the scope this big? Why not compare apples to apples - same scale of football field to football field at CMS vs. CHS?

5 ***In addition, these improvements would cost upwards of \$72 million dollars, which is not currently funded and would require a bond measure to ensure proper financing. This alternative would not include the other improvements proposed as part of the project at the high school.***

- What would cost \$72 Million Dollars? Is there a concept? Can we see the concept?  
- What would a phased cost be for one football stadium with lights as a sub-set of that cost?  
- Why not reduce the scope of the work from \$72 Million dollars (is this multiple fields) so you don't require a bond measure?  
- Have you polled the community for one football field with stadium lights at CMS vs. CHS?  
- What are the details of the \$72 Million dollars for a sound objective

## Response to Letter 14-1-p, Bud Get

1. This comment letter refers to RDEIR PDF page 358, which is page 18-18 of the RDEIR, and is regarding Alternative 4: Alternative Location (New, Lighted Stadium at Carmel Middle School) for Practices and Games. The 2011 study can be obtained through the California Public Records Act. The 2019 Facilities Master Plan, which was utilized in preparation of the RDEIR was identified as presented in Section 20.0, Document and Web Sources and Report Preparers, of the RDEIR (page 20-12), and presented below:

Carmel Unified School District and LPA. *Carmel Unified School District Facilities Master Plan 2019*. Available online: <https://www.carmelunified.org/Page/6080>

2. The commenter discusses the budget of the 2011 study. The comment does not raise an environmental issue and therefore, no response is necessary. Please also refer to response to Letter 14-1-g, comment 3.
3. Construction of the football stadium at Carmel Middle School was evaluated in the RDEIR. Please see discussion of Project Alternative 4 starting at page 2-4 and page 18-17 of the RDEIR. Moving the stadium to any other location with the middle school property would result in the same environmental impacts as discussed under Project Alternative 4. No changes to the RDEIR are necessary.
4. The commenter is referring to build-out of the Carmel Middle School facilities master plan, some of which would need to be implemented if a lighted, high school stadium were constructed at the middle school. Construction of a lighted, high school stadium at the middle school would require reorganizing some of the other facilities. Please see discussion of Project Alternative 4 starting at page 18-17 of the RDEIR. No changes to the RDEIR are necessary.
5. This comment is about the cost of implementing the proposed project at the middle school. It does not raise an environmental issue and therefore, no response is necessary. Please also refer to response to Letter 14-1-g, comment 3.

**From:** Bud Get <budget4jh@gmail.com>  
**Sent:** Saturday, September 10, 2022 10:12 PM  
**To:** CUSD Feedback; Teri Wissler Adam  
**Subject:** RDEIR: Comments for Appendix K

Carmel-By-The-Sea HS TMP

Figure 4: Traffic Management Plan



LEGEND

- "No Event Parking" Sign
- Visitor's Parking & Faculty Parking
- Players & Volunteer's Parking Only
- Shuttle Pick-up & Drop-off
- Faculty Parking Only
- Main Entrance & Exit
- Entrance Only



003-120 | 07/2022



Where is the Traffic Management Plan for the Left Side of Highway 1 in this map layout?

You are encouraging Alternative Mode Encouragement for Families and employees within one mile of campus can be asked to consider walking to school. What the roads, conditions and safe crossings with that 1 mile radius you are recommending?

- Identify all safe side-walks, crossings and traffic lights. This is very dangerous for Highway 1 and Ocean Ave crossing

No Event Parking signs, traffic cones and barricades will be installed in the vicinity of School campus. Yet you provide no details:

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- What are local permit requirements?
  - How would law enforcement be notified?
  - Which agencies would be involved?
  - How would visitors from other schools know?
  - Is there a cost associated with this program?
  - How would you make it policy?
  - This is voluntary, what enforcements would happen if people park where they want?

## Response to Letter 14-1-q, Bud Get

1. Regarding parking on the west side of State Route 1, the proposed project includes the addition of 111 new on-campus parking spaces. See Section 10.0, Transportation and Parking, of the RDEIR, as well as response to Letter 2b, comment 3, regarding implementation of a Traffic Management Plan for highly-attended events. The Regulatory Setting is discussed at Subsection 11.2 of the RDEIR.

Regarding the Traffic Management Plan included in Appendix K of the RDEIR, the measure to encourage walking and bicycling to campus during highly-attended events was supposed to be removed from the draft plan. The plan will be updated to remove this measure before the District's Governing Board considers adopting it. Additionally, Mitigation Measure 11-4 c. has been revised as follows:

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, p~~ 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;

Regarding the safety of students and spectators that currently walk to the campus: if students and spectators don't feel safe walking to campus currently, or in the future, they have other options. See Section 11.0, Transportation and Parking, of the RDEIR, as well as response to Letter 2b, comment 3, regarding implementation of a Traffic Management Plan for highly-attended events. See also response to Letter 14-1-k.

Regarding the components of the Traffic Management Plan, see response to comment 1 above.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Tue, Oct 4, 2022 at 9:24 PM

Subject: RDEIR Feedback: Questions on Musco as a vendor and the proposed selection of stadium lights

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

- 1 | The process of how Musco was selected as a vendor is very vague and unclear.  
The process of how many lighting options were reviewed is very vague and unclear.  
The process of how the decision was made on which specific lights to propose is very vague and unclear.

CUSD has a Project and Bids Landing Page: <https://www.carmelunified.org/Page/608>

- Was there a competitive bid process with other vendors? Who were they? Can we see their bids?
- What was the selection criteria for selecting Musco?
- What was the criteria used to select the lights?
- Can we see what the scope requirement for selection is?
- How did this project, vendor selection and light go so far down the process without Board approval for vendor selection?
- Did vendor selection appear on a School Board agenda for discussion, input or approval? If yes, what dates?
- How was this project submitted to DSA without transparency to the public?
- 2 | • Are there other lights in California or Monterey that Musco has installed that would be similar to those at Carmel High School? Can you reference a location that we can physically visit for the experience?
- How do these lights compare to the ones used at MPC and or Pacific Grove since those are the other schools you are referencing as Alternatives? What are the heights of those poles? What is the measurement of lights in candela? Do they have a Sport Light Package? Do they have dimmers?
- 3 | • Can you provide further understanding of the other options for designs and other vendors?
- Can Musco and/or other vendors speak to the public about how to assess, view and understand light pollution?
- 4 | • Why is CUSD resistant to putting up story poles? This is not only about light pollution at dark but ruining Scenic Highway 1 and the views from Santa Lucia Range as we walk the field during the day.
- 5 | • Are the pool lights from Musco?
- What is the cumulative impact of the pool lights and the stadium light all on?
- 6 | • You mentioned 12 foot pole lights in your new scope of work. What is the cumulative impact of all those lights on at once?
- There are alot of stadium lights across the nation that are lower in height (30-40 feet), Why do we need the 80 foot high ones?
- 7 | • We understand that Musco did the lights for the school district that the Superintendent came from. Was there a connection to previous relationships?
- 8 | • Have we worked with Musco before?



## Response to Letter 14-1-r, Bud Get

1. This comment is about the school district bid process for vendors. It does not raise an environmental issue and therefore, no response is necessary.
2. This comment is about the proposed project stadium lighting compared to other stadiums in the area, as well as California. Lighting impacts are specific to where they are located. Lighting at other stadiums may not be representative of the proposed lights at Carmel High School. Moreover, past stadium light projects at MPC and PGHS are not the subject of the RDEIR.

See Section 5.0, Aesthetics, for the visual evaluation of the lighting both on campus and off campus. Horizontal foot-candles represent the amount of light being received on a horizontal surface and therefore are an appropriate unit of measurement for measuring brightness of lighting directly downward on a surface (i.e., the playing field or stadium seats). A candela is a measurement of luminous intensity or brightness as seen from a distance (i.e., from adjacent or neighboring properties). See section 5.1 under “Light and Glare” and “Lighting Fundamentals” for additional light and glare terms and definitions. Therefore, for purposes of the measurement figures prepared for the RDEIR, candela measurements were chosen for Figure 4-2c to reflect the level of brightness as seen from the edge of campus as opposed to foot-candle measurements measured at a horizontal surface level from the same approximate distance.

3. See response to comment 1 above.
4. Regarding story poles, see response to Letter 2c, comment 1.
5. Musco designed the proposed pool facility lighting retrofit.
6. The cumulative impacts of the proposed stadium lights, the proposed pool facility lighting retrofit, and the new parking lot lights are represented in Section 5.0, Aesthetics, figures 5-12a through 5-20b.
7. The commenter states that “there are a lot of stadium lights across the nation that are lower in height (30-40 feet),” but does not provide any evidence. Additionally, the Illuminating Engineers Society recommends the lighting at 80 feet above the playing surface (Dan Paul, e-mail correspondence with consultant, October 19, 2022). Past projects at other school districts are not the subject of the RDEIR. This Final EIR addresses comments on environmental impacts of the proposed project and the RDEIR, and does not apply to previous projects.
8. See response to comment 1 above.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Tue, Oct 4, 2022 at 9:27 PM

Subject: RDEIR: Lighting Data for Swimming Pool - Duplicate the Data from Appendix C.

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>,<[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>

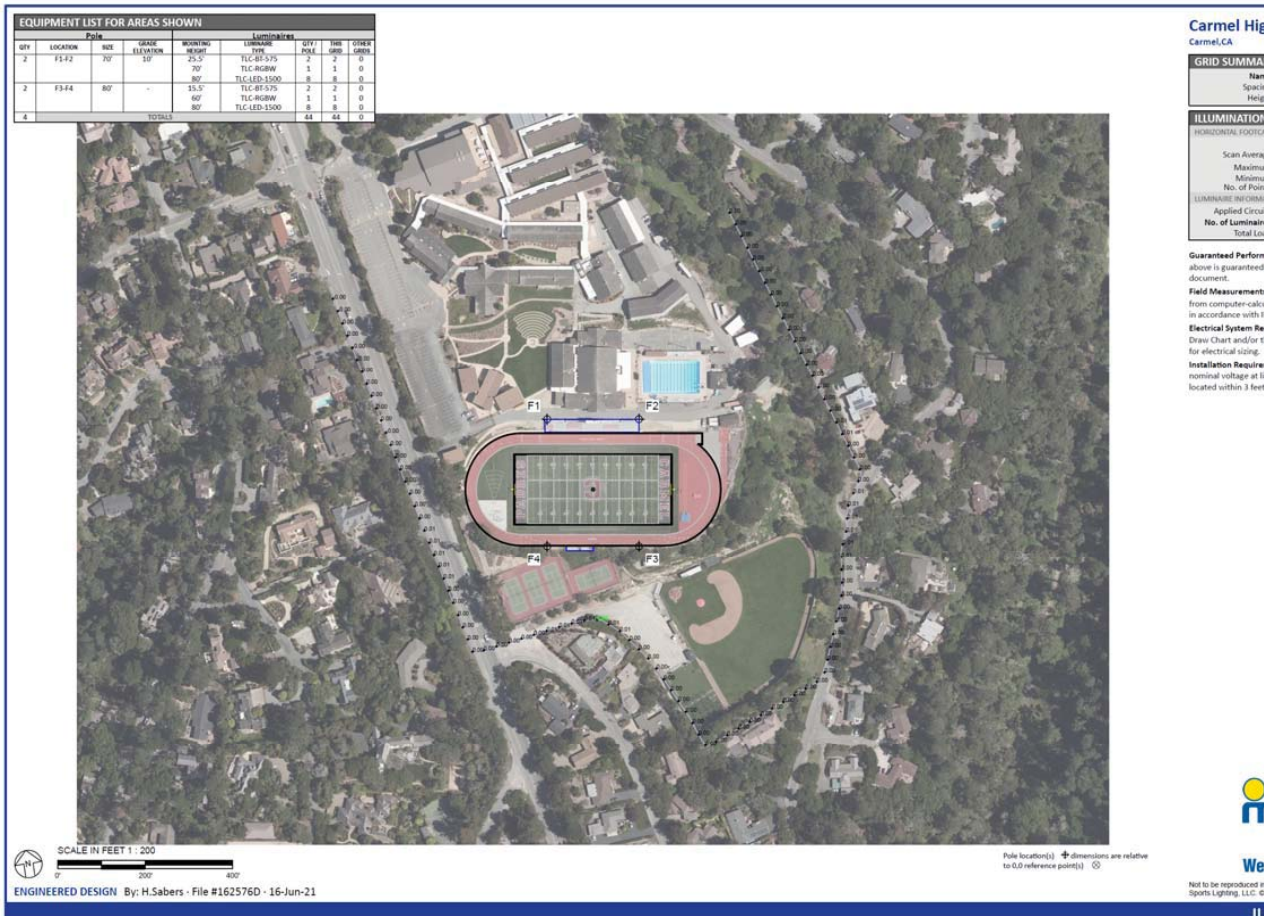
<[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>

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In Appendix C, you've provided comprehensive lighting data for the proposed stadium lights at the athletic field.

Given you have expanded the scope of work for the RDEIR (outside of the Notice of Preparation) to include the swimming pool lights, we'd like a duplicative set of lighting data for the pool lights similar the proposed stadium lights. Information should include:

- What is the Lighting System with Pole/Fixture Summary?
- What is the Lighting Level Summary?
- What is the Illumination Summary for the Maintained Horizontal Footcandles?
- What is the property spill? Can we have page 8 visual duplicated to understand what is the base and then what will be the proposed improvements? Is there a side-by-side comparison for level of improvement to understand cost value benefit?
- You have a schedule of when events will be happening both at the stadium field and at the pool - where is the cumulative impact of them being both on together? Can you provide the same data for the individual lights but show how the cumulative will look in property spill, etc?



## Response to Letter 14-1-s, Bud Get

1. Attachment C in the RDEIR includes lighting data for both the proposed lighting at the stadium, as well as the proposed pool facility lighting retrofit. Data is presented individually each for the stadium and pool facilities, and combined for both facilities.

Section 5.0, Aesthetics, includes an evaluation of the lighting impacts of the proposed project, which includes both the stadium lighting, the pool facility lighting retrofit, and the new parking lot lights.

With respect to questions regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Tue, Oct 4, 2022 at 9:46 PM

Subject: RDEIR: Why Not Portable Lights (alternative solution)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

- 1 • Why are temporary, portable, LED sports field lighting not a viable option?
- They can be run from external power or a user-supplied small generator (1000W). On-site electrical power is very energy efficient (NOT Diesel).
- Was configuration of electrical lighting to provide safe and adequate field lighting assessed?
- Units can be linked together easily. Light tower packs up small enough to fit two of them in the back of a pick-up truck.
- Perfect for lighting sports fields, football, soccer, lacrosse or any other sport.
- Doesn't Monterey Peninsula Unified School District use them?
- What are other schools in CA doing to implement Late Start and not install stadium lights?
- Do you have any stats of how many high school in CA have implemented Late Start but don't have lights?
- Wouldn't the portable lights be more sustainable solution as one of your alternatives?
- 2 • How do any of your lighting decisions fit into the legislation, Senate Bill 1020, requires that California get 90% of its power from renewable sources by 2035 – the same year the state is now scheduled to end sales of gasoline-powered cars – and 95% by 2040 while retaining the 2045 deadline for converting to a carbon-free electrical grid.

## Response to Letter 14-1-t, Bud Get

1. This comment is regarding an alternative of using portable lights. The commenter does not provide enough information to determine if portable lights would be a feasible alternative to the proposed light poles. During research activities, the following website was found: <https://www.beaconledtower.com/sports>. This website includes word for word, many of the bullet points in this comment letter. The portable light poles are a maximum of 16 to 18 feet, which is about ½ the height of the goal posts. See the attached data sheet. Therefore, these portable lights would not be of sufficient height for high school sports.

Regarding providing safe and adequate field lighting, yes, the design and configuration of the proposed light poles are consistent with the recommendation from the Illuminating Engineering Society for safe and adequate field lighting.

Regarding what other schools are doing regarding lighting and implementing the Safe Start law is not relevant to the environmental impacts associated with the proposed project. Therefore, no response is necessary for these questions.

2. Regarding the use of renewable energy sources, in 2018, the school district began obtaining electricity from Central Coast Community Energy (formerly Monterey Bay Community Power), which provides clean, carbon-free power at a lower cost than power provided by PG&E. Central Coast Community Energy is a locally-controlled public agency, funded by rate-payer revenue and not by taxes or other public funds. <https://3cenergy.org/about-us/>



# All-In-One Beacon LED Tower

The Lind Equipment **five-time award winning** Beacon LED Tower brings you all the light you've come to expect from traditional 4x1000W metal halide light towers, but in a new, revolutionary package. The **compact, lightweight, and truly man-portable**, All-In-One Beacon LED Tower can be used as an electric powered light tower, a generator powered light tower and as a no-glare diffuser light tower.

The All-In-One full-power light tower has three modes for different applications. The diffuser mode for roadside construction and events. The electric tower mode for quiet, indoor, fume-free lighting, and a user supplied 1000-2000W generator mode to illuminate remote areas. The All-In-One is a **single asset that replaces owning, maintaining and transporting three separate lighting assets**. Why own three when you only need one?

The no-glare diffuser frames tightly clip onto the back of the powerful, 30,000 lumen light heads to prevent any movement while in use. Easily adjust the light heads to provide diffused light in the direction you need it most.

### KEY BENEFITS

- Whisper-quiet operation
- Incredibly easy deployment
- Very low maintenance required
- Ability to daisy-chain multiple towers and tools
- **2 Towers can run on a 15A circuit**
- Use with 'suitcase' type generators, or run off external power
- Direct Drive high-efficiency LED lighting
- Diffuser frames fit into a carrying case
- **Clip on diffuser frames in under one minute**
- Fits through man doors and two towers can easily fit in the back of a pick-up truck
- LEDs are maintenance free
- No ballast or bulbs to break

**HALF** the cost of light traditional towers

All-In-One Beacon LED Tower's are also available in the **Lay-Flat Model**

**LE980LED-T4-AIO**



**LE980LEDV-T4-AIO**

### AWARDS



Made in Canada & the U.S.A.





# All-In-One Beacon LED Tower

SPECIFICATIONS		LE980LED-T2-AIO	LE980LED-T4-AIO	LE980LEDV-T2-AIO	LE980LEDV-T4-AIO
<b>Description of the Tower</b>		Two-light Lay-Flat Mast	Four-light Lay-Flat Mast	Two-light Vertical Mast	Four-light Vertical Mast
<b>Colour Choice</b>		Add '-B' for the black colour model, add nothing for yellow			
<b>Lights</b>	Power	400W	800W	400W	800W
	Amperage	3.3 Amps @120V	6.7 Amps @120V	3.3 Amps @120V	6.7 Amps @120V
	Lumens	60,000	120,000	60,000	120,000
	Voltage	90V-277V			
	Ingress protection	IP65 Weatherproof			
	Construction	Aluminum housing, polycarbonate lenses			
	Rated hours & Temp	Over 50,000 hours - Light Temperature 4,500K			
	Approvals	cETLus			
<b>Diffusers</b>	Construction	Steel frame with ripstop nylon diffuser covers			
<b>(Mast</b>	Max height	18' (from the ground)		16' (from the ground)	
	Construction	Steel			
	Wind resistance	45 mph			
<b>Chassis</b>	Construction	Steel frame			
	Outriggers	Outriggers extend to 2' beyond frame			
	Tires	Foam-filled rubber tires			
	Features	Caster wheels • Side access forklift guides • Four rigging points			
	Dimensions (stowed)	L: 65" • W: 31" • H: 35" (mast down)		L: 52" • W: 39"(32" fully in) • H: 82"	
	Weight	300 lbs	350 lbs	350 lbs	380 lbs
<b>Cabinet</b>	Construction	Steel			
	Internal dimensions	L: 27" • W: 21" • H: 19.5"			
	Features	Lockable • Ventilated • On/off switch • Daisy-chain outlet			
<b>Fuel Tank</b>	Dimensions	L: 19.3" • W: 12.2" • H: 10.2"			
	Capacity	6 Gallons • 23 Litres			
	Features	<ul style="list-style-type: none"> <li>• Comes complete with hose and fuel cap that will fit most popular suitcase generator models. Alternative cap sizes available - call Lind</li> <li>• Removable auxiliary tank</li> </ul>			
	Run time	Approx 45 hours on standard 2000W suitcase generator with auxiliary fuel tank			
<b>Generator</b>	Units do not come standard with a suitcase generator. Lind can also supply for additional cost.				



For more information about the Beacon LED Tower:

[www.BeaconLEDTower.com](http://www.BeaconLEDTower.com)

[www.lindequipment.net](http://www.lindequipment.net) | [info@lindequipment.net](mailto:info@lindequipment.net) | T: 877.475.LIND





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From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Tue, Oct 4, 2022 at 9:35 PM  
Subject: RDEIR Feedback: Public Comments from First DEIR Must Be Addressed: Part I  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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ON PAGE 22: You briefly mention:

*The school district has substantially revised the former draft EIR, and this RDEIR replaces the previous draft EIR in its entirety. Therefore, the comments received on the original draft EIR will not receive a response or be addressed in the final EIR. Only the public comments received during the 45-day public review period for the RDEIR will be responded to and be addressed in the final EIR.*

We agree that the school district has SUBSTANTIALLY revised the former draft EIR. The new scope is significant expanded and UNRELATED to stadium lights.

Is this legally allowed?

Can you provide context why this scope was expanded to include each of the new areas?

- New 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.

In addition, you added scope but not changed the core EIR surrounding the stadium lights. Therefore, we've reviewed original comments and are re-submitting as they remain valid for your response. Please review and respond to each of the submissions as they pertain to the stadium lights which are still core to this RDEIR but expanded to the above.

## Response to Letter 14-1-u, Bud Get

1. This comment is about the purpose for the substantially revised draft EIR. The original draft EIR was revised to address concerns received during the 45-day public review period for the original draft EIR. See Section 1.0, Introduction, for a detailed discussion of why the draft EIR was revised, and how it was revised. Please also refer to response to Letter 11b, comment 16. Revisions to the project scope and original draft EIR, and recirculation through issuance of the RDEIR, is legally permissible pursuant to CEQA Guidelines, § 15088.5, subd. (f).)

Regarding the comment about that the RDEIR does not change the core EIR surrounding the stadium lights, see Section 5.0, Aesthetics, for the expanded scope of the analysis, as well as the response to Letter 2b, comment 1 regarding the visual assessment of lights.

The commenter states he/she is resubmitting all comments on the original draft EIR from 2021, including comments of others. These comments on the original draft EIR are part of the administrative record, but as stated in the RDEIR, and as allowed by CEQA, this final EIR will not respond to comments made on the original draft EIR, nor shall these original comments be included in the final EIR. The Notice of Completion and Availability for the RDEIR and the RDEIR, itself, advise the public that comments received on the original draft EIR will not receive a response in the final EIR and that new comments must be submitted for the RDEIR. (CEQA Guidelines, § 15088.5, subd. (f)(1).) In addition to such notices provided under CEQA, the district has also made the public aware of this through public status updates posted on the district's website (See <https://www.carmelunified.org/domain/774>), and via other communications with members of the community.

Moreover, the district elected to respond to comments received on the original draft EIR by revising the draft in its entirety and recirculating it for a second round of public review and comment in accordance with the CEQA Guidelines. (CEQA Guidelines, § 15088.5, subd. (f)(1).) Accordingly, the district has already provided a response to these original comments by issuing the RDEIR.

For purposes of this Final EIR, the district must evaluate and respond to comments on environmental issues “received from persons” who reviewed the RDEIR. (CEQA Guidelines, § 15088, subd. (a).) If a person does not comment within the public comment period for the RDEIR, the district shall assume that the person “has no comment to make.” (Id., § 15207.) Nothing allows a person to submit comments for someone else, or requires the district to respond to comments that are not received from the person allegedly

commenting. This distinction is critical to maintaining a clear record of those persons that actually submitted timely public comments on the RDEIR and the environmental impacts of the proposed project. (Pub. Resources Code, § 21177.)

No further response is needed.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Tue, Oct 4, 2022 at 9:49 PM

Subject: RDEIR: Cell Towers on Stadium Lights

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>,

<[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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**No where in the RDEIR is the risk and environmental impacts discussed regarding cell towers on stadium lights. Carmel By The Sea is in the middle of a battle with Verizon.**

<https://stopcelltowersincarmelneighborhoods.com/community-action>

### Community Action

On 9/29/21, the Planning Commission of Carmel voted unanimously to deny Verizon's application for a permit to put a 51' cell tower in a Carmel-by-the-Sea residential neighborhood. The basis for their denial was that the proposed tower would negatively impact the neighborhood, violate city codes, obstruct views and jeopardize the aesthetics of the community. The decision followed hours of testimony from residents who opposed the idea on grounds ranging from property devaluation and noise to the possible negative health effects and safety concerns from radio waves, fall zone and fire risks. Residents also sent hundreds of emails and mailed postcards asking Commissioners to deny the application.

On 10/11/21 Verizon filed an appeal of the Planning Commission decision with the Carmel City Council. The City Council will most likely rule on the denial in the upcoming November 2nd Carmel City Council meeting. Your comments in favor of upholding the Planning Commission's denial are desperately needed.

If the city council overturns the Planning Commission decision and allows Verizon to install this tower, we will see a proliferation of cell towers in Carmel's residential neighborhoods. Under federal law, if this Verizon tower is allowed, the city may not deny competing carriers' future permit applications.

- How would you mitigate the risk of preventing cell towers being installed on top of the stadium lights?
- What laws, policies or zoning ordinances would apply for preventing this?
- What efforts would you put in place to prevent this from happening?



## Response to letter 14-1-v, Bud Get

1. The proposed project does not include putting cell towers on the stadium light poles. Moreover, Carmel High School is not located within the boundaries of the City of Carmel-by-the-Sea's jurisdiction. If the school district were to receive a request from a cell company to place cell towers on the stadium lights, should they be approved and constructed, the District's Governing Board has the authority to approve or deny the request, however, unanticipated and unknown future projects at Carmel High School such as this are outside the scope of the RDEIR. This final EIR only addresses comments on the RDEIR and the environmental impacts of the proposed project. No further response is needed.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Tue, Oct 4, 2022 at 9:52 PM

Subject: RDEIR: Ephemeral Drainage and Damage to homes on Morse Drive

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>,

<[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)> \_\_\_\_\_

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Source: ESRI 2021, Monterey County GIS 2019



Figure 7-1  
Habitat Map

Carmel High School Stadium Lights EIR

**PROBLEM: Lack of Clarify:**

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con't.

Can you further elaborate on "A **potentially jurisdictional aquatic** feature was identified outside of the project site boundary on the east side of the football stadium (Figure 7-1, Habitat Map). However, this drainage is located approximately 100 feet south of the proposed eastern parking lot and approximately 100 feet southeast of the proposed storage building, outside of the project impact area .Impacts to protected wetlands or waters of the U.S. are therefore **not anticipated as a result of the project**.

- How do you mitigate the "Potential"? Is this regarding Hatton Canyon Protected Wetland?
- How do you mitigate the "not anticipated" - can you provide further analysis and confirmation? We don't believe that this isn't a "no impact" issue.

2

- Also, you've introduced several significant new scopes of work with NO DETAILS! Water flow and drainage into the residential homes have happened in the past historically. How do we know any new proposals won't cause water flow damages into the home where there arrow is above? Homes on Morse Drive are especially vulnerable.
- Is there a specific way to assess if water coming down the hill won't impact the homes on Morse Drive?
- Are you aware of the history of floods and homeowner damage to the homes on Morse Drive?



## Response to letter 14-1-w, Bud Get

1. This comment refers to the drainage feature discussed and analyzed on the following pages of the RDEIR: pages 7-5 and 7-6 (physical setting); 7-18 (physical setting associated with habitat for special-status species); and 7-32 (impact discussion). A potentially jurisdictional feature refers to an aquatic feature, such as a wetland, pond, creek, stream, or river that could be considered jurisdictional, but has not been delineated following guidance from the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, or Regional Water Quality Control Board. Because the feature is located approximately 100 feet from the project impact area, a formal delineation is not necessary.

Regarding water quality, as described in Section 12.0, Soils, Erosion, and Water Quality, the school district would need to obtain coverage under the statewide National Pollution Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) (NPDES Permit, 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ) because the project would disturb more than one acre. Obtaining coverage under the Construction General Permit involves submitting a Notice of Intent to the Regional Water Quality Control Board and developing a stormwater pollution prevention plan (SWPPP) that contains Best Management Practices which would, among other measures, prevent transport of earthen materials and other construction waste materials, prevent wind erosion, and require preparation of a spill prevention and containment plan.

Additionally, the proposed project would be required to comply with Post Construction Stormwater Management Requirements for Development Projects in the Central Coast Region, Central Coast Regional Water Quality Control Board Resolution No. R3-2013-0032. Flow-through tree box filters would be used in both new parking lots.

In summary, the proposed project will not directly disturb the drainage, and implementation of measures contained in the SWPPP would ensure indirect project impacts associated with degradation surface or ground water quality would be reduced to a less-than-significant level.

2. This comment concerns water flow and drainage into residential homes. The commenter provides no evidence that water flowing from the high school has flooded and damaged nearby residences. There is nothing regarding the proposed project that would result in a significant increase in water flowing off the site as the school district is required to obtain coverage under the statewide National Pollution Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) (NPDES Permit, 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ) because the project would disturb more than one acre. This is discussed in Section 12.0, Soils, Erosion, and Drainage.

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From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Tue, Oct 4, 2022 at 10:15 PM  
Subject: RDEIR Feedback: Rancho Canada Village / Student Enrollment and School Capacity  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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**On Page 323 you state:**

- The Rancho Canada Village project may **substantially** affect aesthetic conditions depending on the extent of its visibility from certain publicly visible areas.

**More information Required for Mitigation Measures:**

- 2 • Has the building developer been notified?
- 3 • Can we have KOPs from here?
- 4 • You need to put story balloons up so builder knows the impact and may change the house designs
- 5 • Isn't this Clint Eastwood's housing development? This will significantly impact housing developments and sales.
- 6 • While you acknowledge Ranch Canada Village as a project in the area, why didn't you include the student growth that is coming from that development into your considerations for alternatives?
  - What is the current student demographic report referenced below and wouldn't this provide valuable input into evaluating CMS as an alternative solution even higher?
  - How is the school's student enrollment capacity calculated? Is there a best practice or guidelines? What is the reference?
  - What is CHS student capacity? How are you determining that?
  - Given the data you are providing Ranch Canada isn't the high school reaching capacity?

4 **Comment 4-5**

5 This comment states that the student generation rate used to calculate the number of students that  
6 would be generated by the Proposed Project and the 130-Unit Alternative in *Chapter 3.10, Public*  
7 *Services, Utilities, and Recreation*, of the RDEIR is too low, is not supported by substantial evidence,  
8 and fails to accurately reflect the true impact the Proposed Project and the 130-Unit Alternative  
9 would have on schools in the Carmel Unified School District (CUSD). The commenter does not  
10 provide an alternative rate that could be used in lieu of the rate used in the RDEIR, but notes that the  
11 CUSD governing board has authorized the CUSD to obtain a current student demographic report that  
12 will provide accurate student generation data.

13 In response to this comment, the EIR preparer contacted the CUSD to request a copy of the  
14 demographic report referenced in the comment. The CUSD indicated that report is still in progress,  
15 and was unable to provide an estimated date of completion. However, in the absence of the  
16 demographic report, the CUSD confirmed that 0.34 students per unit would be an appropriate rate  
17 to use in the RDEIR analysis.<sup>14</sup> This rate is based on the student generation rate used in the DEIR for  
18 the Pebble Beach Inclusionary Housing Project (State Clearinghouse No. 2011041028). Accordingly,  
19 the analysis of school impacts in Chapter 3.10, *Public Services, Utilities, and Recreation* has been  
20 revised to reflect the updated student generation rate (see Chapter 4 in this document). Based on  
21 the updated student generation rate, the Proposed Project would generate approximately 96 school-  
22 aged children (compared to the 51 students estimated in the RDEIR), and the 130-Unit Alternative  
23 would generate approximately 44 school-aged children (compared to 23 students estimated in the  
24 RDEIR).

25 In evaluating a project's potential impacts related to schools, CEQA's focus is on impacts to the  
26 physical environment, which could occur from actions such as the construction of new school  
27 facilities or increasing bus trips to accommodate new students. As noted in Comment 4-7, according  
28 to the CUSD, at least one of the schools that serves the Project Site is at full capacity. However, at this  
29 time, the District is studying different options to relieve future overcrowding and has not identified  
30 specific plans with a reasonable degree of certainty.<sup>15</sup> Thus, while it is clear that solutions are  
31 needed to relieve future overcrowding, it would be speculative at this time to presume that the  
32 additional students generated by the Proposed Project or the 130-Unit Alternative would result in  
33 actions that would create physical impacts on the environment and speculative to identify what  
34 those physical impacts would be.

35 Further, the CUSD levies school developer fees as authorized by SB 50, and the Project Applicant  
36 would be legally required to pay these fees. Pursuant to Government Code Section 65995, the  
37 payment of these fees by a developer serves to fully mitigate all potential project impacts on school  
38 facilities from implementation of a project. Thus, while the estimated student generation would

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<sup>14</sup> Personal communication with Rick Blanckmeister, Chief Business Official, Carmel Unified School District. Telephone conversation with Rich Walter and Heidi Mekkelson – August 29, 2016. Email correspondence - August 30, 2016. Telephone conversation with Heidi Mekkelson – September 9, 2016.

<sup>15</sup> Ibid.

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con't.

1 increase as compared to what was analyzed in the RDEIR, with payment of school developer fees, no  
2 new significant impacts to the environment would occur, and mitigation is not required.

3 For the reasons stated above, the changes to the student generation estimate in the RDEIR do not  
4 constitute "significant new information" pursuant to Section 15088.5 of the CEQA Guidelines, and  
5 recirculation is not required.

6 **Comment 4-6**

7 This comment questions the RDEIR's conclusion that impacts on schools would be less than  
8 significant, particularly in light of the fact that the Proposed Project and 130-Unit Alternative would  
9 generate additional students that would increase the demand on the schools that serve the Project  
10 Site. As discussed above, in evaluating a project's potential impacts related to schools, CEQA's focus  
11 is on impacts to the physical environment. See **Response to Comment 3-5**.

12 **Comment 4-7**

13 This comment states that the RDEIR and the conclusions drawn therein fail to acknowledge that  
14 Carmel River Elementary School is at full capacity and that student enrollment is increasing. The  
15 RDEIR notes that the Carmel School District has experienced an increase in enrollment at a rate of  
16 2.95% per year between 2004 and 2014 (see page 3.10-4), but does not include enrollment and  
17 capacity data specific to the schools that serve the Project Site. In response to this comment, the EIR  
18 preparer contacted the commenter and requested enrollment and capacity data that could be  
19 presented in this Final EIR. The CUSD indicated that it could not provide capacity data, but could  
20 provide enrollment data that show a historic trend of increasing enrollment.<sup>16</sup> However, the CUSD  
21 did not provide the data after multiple requests. As such, the EIR preparers were unable to add the  
22 data referenced in this comment to the Final EIR.

23 See **Response to Comment 3-5** regarding the impact conclusion in the RDEIR.

## Response to Letter 14-1-x, Bud Get

1. The commenter refers to page 323 of the RDEIR PDF, which is page 15-7 of Section 15.0, Cumulative Impacts, in the RDEIR. This section of the RDEIR addresses cumulative effects as required by CEQA and CEQA Guidelines section 15130. The CEQA requirements, as well as the required analysis, is included in Section 15.0, Cumulative Impacts, in the RDEIR.
2. The school district is not required to individually notify the Rancho Canada developer about the RDEIR. Public notices were issued by the district in accordance with CEQA. Please refer to Section 1.0 of the RDEIR for further discussion.
3. The nearest Key Observation Point (KOP) evaluated in the RDEIR is KOP 8, which is located at the Carmel Rancho Shopping Center, approximately one-third of a mile from the Rancho Canada project. See also response to Letter 2c, comment 19.
4. Regarding story balloons, see response to Letter 2c, comment 1.
5. This comment does not raise an environmental issue and therefore, no response is necessary.
6. The comments regarding student growth generated by the Rancho Canada project is not relevant to the environmental analysis in the RDEIR. Additionally, the commenter attaches what appears to be a response to a comment from another EIR. Therefore, no response is necessary.

Student enrollment at Carmel High School is addressed on page 3-21 of the RDEIR. Enrollment growth is not anticipated as a result of the proposed project. Please see Subsection 17.2, Growth Inducing Impact Analysis, in the RDEIR for further discussion.

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From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Tue, Oct 4, 2022 at 10:19 PM  
Subject: RDEIR Comments: CMS Facilities Planning for Future  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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**PROBLEM: YOU STATE:**  
**Master Planning at Carmel Middle School**

*In 2011, the school district studied constructing a stadium complex at Carmel Middle School, but the space required to accommodate such a stadium was determined to be infeasible given space requirements. The estimated cost in 2011 was \$24 million. Subsequently, the school district acquired the adjacent, undeveloped property and in 2019, prepared the Carmel Unified School District Facilities Master Plan (2019 master plan) which provided for a revision of the Carmel Middle School campus athletic facilities to maximize outdoor learning and playfields for all students across the school district. This revision included the potential for up to six baseball or softball diamonds, two soccer fields, a lighted outdoor track and football field, four outdoor basketball courts, eight tennis courts spread across the extent of the existing middle school campus (see Figure 5.9 of the 2019 Master Plan, included as Figure 18-4, Carmel Middle School Proposed Master Plan Diagram (2019 Facilities Master Plan)).*

**PROVIDE MORE INFORMATION FOR PROPER DECISION MAKING:**

- Provide a copy of what the school district studied in 2011 when studying construction of a stadium complex at CMS? What specifically about the space determined it to be infeasible?
- You state an estimated cost of \$24 MM. How was that cost arrived? One field, all fields, lights, turf? Can we see the breakdown? You can't dismiss CMS as a viable option without the details for us to assess whether it is viable or not.
- The study was conducted in 2011 but the additional property purchased post 2011. Should the study be revisited? What current work has been done for the new purchase of 8.32 post 2011?
- You've stated several times that these improvements would cost upward of \$72 Million dollars, yet provide no basis for how that estimate was arrived at? What is the scope? Could the scope be scaled down to one football field with lights?
- Isn't it time to refresh the Facilities Master Plan? What is the timeline for that?

## Response to Letter 14-1-y, Bud Get

1. See response to Letter 14-1-p.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Tue, Oct 4, 2022 at 10:03 PM  
Subject: RDEIR Feedback: Photo of Scenic Highway 1 (No sidewalks or Bike Paths)  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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There are several areas in the RDEIR where you tout you will encourage walking and/or use of bike paths. The Transportation Agency for Monterey County (TAMC) (dated June 14, 2021) also encourages the evaluation of all potential nighttime special events, and consideration of safe bicycle and pedestrian connections to the project site.

- How are you encouraging alternative methods of arrival on this no sidewalk or bike pathway?
- I will send multiple photos but none show the safe encouragement of walking or bike usage.
- PAGE 279: You agree there are no sidewalks and bicycles facilities (i.e., bike lanes and bike routes) along State Route 1. Therefore, it is anticipated that a majority of attendees would drive to the school campus.
- This photo is of Scenic Highway 1 described above. Can you cite how dangerous this stretch of highway one is? Violations, etc?
- You don't provide a visual of the challenges and are unclear with specific of how you are going to make this safe at night? Orange cones? More law enforcement?
- You talk alot about shuttle buses but not about safety measures at the campus around it.
- Instead of a TMP, do you need a School Zone Safety Plan outlined?

## Response to Letter 14-1-z, Bud Get

1. This comment is regarding the school district encouraging walking and biking to games expected to be high attendance. See response to Letter 14-1-q, comment 1.

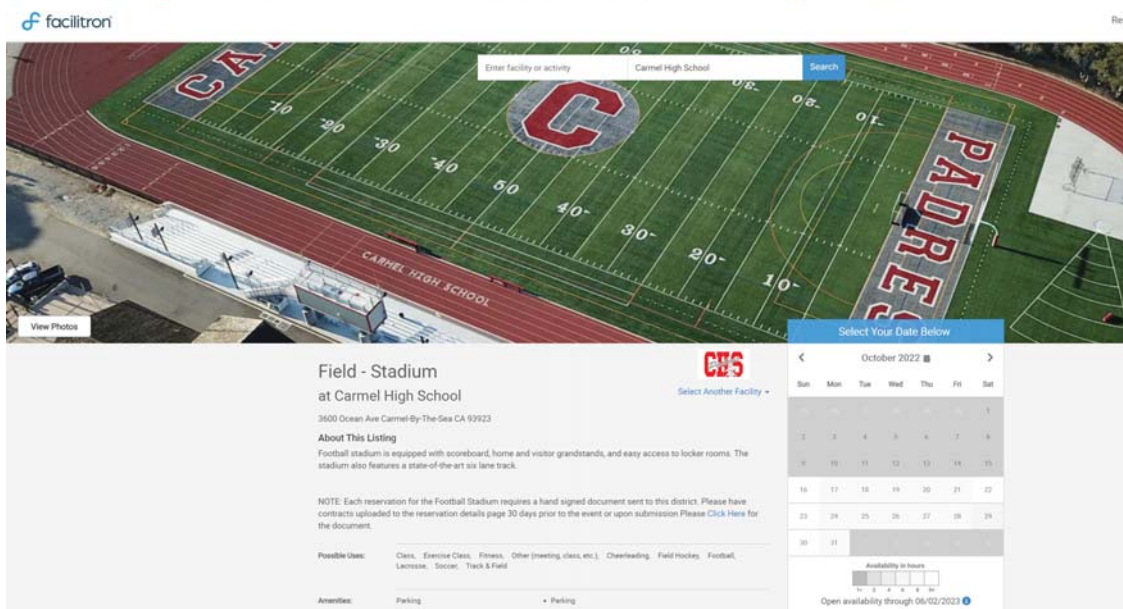
From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Tue, Oct 4, 2022 at 10:17 PM  
Subject: RDEIR Feedback: Policies around Athletic Facilities  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

**PAGE 314: You state: Carmel Unified School District**

*The school district does not have any policies associated with the construction of athletic Facilities. The school district's governing board does have policies that govern the use of school facilities, including athletic facilities, by community groups consistent with the Civic Center Act (Ed. Code, section 38130, et seq.; see BP & AR 1330.).*

1 | The Act declares that every public school facility is a civic center in which the public may meet and engage in certain activities.  
<https://www.facilitron.com/facilities/5df8c2822c254a1fd0ed>

Will you be providing a clear and legally binding Mitigation Monitoring and Reporting Plan (MMRP) that limits usage for swimming pool and stadium?  
Can you provide your intent beyond a school policy? What are you willing to be held accountable for?



2 | Are you making money off the pool now? Is that a revenue generator?

## Response to Letter 14-2-a, Bud Get

1. Regarding limitation of the use of the pool and stadium after dark, see Mitigation Measure 5-2b.
2. This comment does not raise an environmental issue. Therefore, no response is necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Tue, Oct 4, 2022 at 10:20 PM

Subject: RDEIR: Feedback: Impact of this Project on Point Lobos / Carmel River Beach/Santa Lucia Preserve

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

**PROBLEM:**

- Visual Impact Map (page 127) indicates Point Lobos State Reserve and Carmel River Beach State Park are part of the Environmental Impact Area.
- However, you have not fully shown the light spill to these protected areas through a numerical impact.

**MITIGATION MEASURE:**

- Can we see the property light spill to the point of zero in formats similar to what is on Appendix C Lighting Page 10 for Point Lobos and Carmel River State Beach
- Visually show how far the light pollution will impact these protected areas through the various elevations.
- Can you integrate implications to all aspects of the RDEIR including Biological Resources. Please speak to the existing study that light pollution impacts wildlife
- **United Nation Environment Information: [Global light pollution is affecting ecosystems—what can we do?](#)**

2

**PROBLEM:**

- Point Lobos State Reserve / Carmel River Beach are part of the Visual Identity Map of Light Pollution and you don't acknowledge the in the Cumulative Project List

**Mitigation Measures:**

- Acknowledge the CEQA for Point Lobos ParkIT! Shuttle Program
- Describe the intersection of the offsite parking at the Marathon Flats Facility and Palo Corona with the shuttle route you are proposing for off-site parking.
- What are the time overlaps for potential shuttles on Highway 1
- Include in your Table 15-2 Cumulative Project List

3

**PROBLEM:**

- Your Visual Impact Map (page 127) is limited to 3.5 Mile Radius and decision makers can't properly assess the environment impact, especially if it reach protected areas like the Santa Lucia Preserve

**Mitigation Measures:**

- Extend the Visual Impact Map (page 127) to the point of zero impact so we can see if the Santa Lucia Preserve is part of the impact

## Response to Letter 14-2-b, Bud Get

1. This comment is about light spill from the proposed lighting on Point Lobos State Reserve, located approximately 2.5 miles from the high school campus, and Carmel River Beach State Park, located approximately 1.5 miles from the high school campus.

As presented in Section 5.0, Aesthetics, of the RDEIR, and response to Letter 2c, comment 19, no light spill would occur beyond the campus boundaries. The luminous intensity or brightness of the lights would be seen from a distance at locations throughout the vicinity of the high school. Nine locations in the vicinity were chosen to represent the impacts.

The commenter refers to PDF page 127, which is Figure 5-2, Viewshed Analysis Map, of the RDEIR. It is unlikely that the lights could be viewed from Carmel River State Beach due to the low elevation and intervening topography. The lighting may be seen from portions of Point Lobos State Reserve. Refer to page 5-39 of the RDEIR under the impact 5-1 discussion of “Effects of Scenic Vistas and the Visual Character and Quality of the Project Site.”

Lighting impacts on biological resources is presented in Section 7.0, Biological Resources of the RDEIR.

No changes to the RDEIR are necessary.

2. Regarding the Point Lobos ParkIT! Shuttle Program, California State Parks adopted a mitigated negative declaration (MND) on September 26, 2022 for the ParkIT! Shuttle Program & Day-Use Reservation System. The MND reports on page 29 that the ParkIT! Shuttle Program does not propose any new sources of light or glare. Therefore, there are no cumulative lighting impacts to evaluate. No changes to the RDEIR are required.

The commenter requests information about the ParkIT! shuttle program, the proposed project Traffic Management Plan for shuttling spectators from Carmel Middle School to Carmel High School a few evenings per year, and asks for a description of the offsite parking at the Marathon Flats area near the intersection of Rio Road and State Route 1 and Palo Corona Regional Park, but does not raise an environmental issue. Therefore, no response is necessary.

3. See response to Letter 2b, comment 2. No changes to the RDEIR are necessary.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Tue, Oct 4, 2022 at 10:21 PM

Subject: RDEIR Feedback: Agency Notification for CDFW (SAVE THE RED LEGGED FROG)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 **Given you significantly changed the Project Objectives AND the Project Characteristics AND won't acknowledge previous comments AND have re-started the Scoping/NOP have you also disregarded updating the agencies?**

**QUESTIONS:**

- 2
- **Did you submit new project plans and notify all the agencies below?**
  - **Given the significant new scope, shouldn't their input be garnered and this should go back to Scoping and NOP for their required review?**
  - **This says it has high potential for the red-legged frog.**
  - **You are not demonstrating good faith. You are misleading.**

**The California Department of Fish and Wildlife (CDFW) (last dated June 14th, 2021 in NOP and referenced in DEIR but the new scope not part of their assessment in RDEIR)**

- the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code may be required. Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird
- The NOP indicates there is potentially significant impact unless mitigation measures are taken but the measures are not listed. CDFW is concerned regarding potential impacts to special-status species including, but DocuSign Envelope ID: E42AF403-8065-465F-AE72-6B76B49D7706 not limited to: **the federally threatened California red-legged frog (*Rana draytonii*), the State endangered foothill yellow-legged frog (*Rana boylei*),** species of special-status bats, and special-status plants, including the California Rare Plant Ranked (CRPR) 1B.1 Hickman's onion (*Allium hickmanii*), and CRPR 1B.1 Monterey clover (*Trifolium trichocalyx*).



## Response to Letter 14-2-c, Bud Get

1. Notice of Availability of this RDEIR was submitted to all relevant federal agencies, state agencies, regional agencies, and local agencies as required by CEQA, as well as members of the public requesting such notice under CEQA. This RDEIR was submitted to every agency that commented on the Notice of Preparation and every agency and member of the public that commented on the original draft EIR.

For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.

2. The commenter includes language from the California Department of Fish and Wildlife's response to the NOP, which is included in Appendix A of the RDEIR. See Section 7.0, Biological Resources, regarding the proposed project's impacts to biological resources. A second NOP is not required when a lead agency revises and recirculates a draft EIR in response to public comments. See also the California Department of Fish and Wildlife's comment letter on this RDEIR and responses (Letter 131). The department had one comment regarding some wording modifications to mitigation measure for nesting birds.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Tue, Oct 4, 2022 at 10:33 PM

Subject: RDEIR: Comments regarding Objectives and Implications to Minority Students (Page 71)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>,<[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

You State one of your Objectives on Page 71 is:

*3) Provide the capability to host sport events and games for Carmel High School students in the evening when students, parents, and community members can more easily attend;*

- It's unclear how stadium lights or any of the improvements make it easier for any of the stakeholders to attend. Have you surveyed the stakeholders for confirmation? It seems like kids would have too long of day and would be too tired for night games?
- Please provide clarification, insights and implications to minority students who are most at safety risk living in areas that are far (Carmel Valley, Big Sur, Cachuga) -- all these areas have high minority students. Are there any athletes from these geographies? What sports do they participate in? Do they not participate because of the distance? Would evening events further discourage participation because of safety and how tired they are to travel at night? What are the safety risks for these student athletes?
- Are you making sports less accessible to minorities by doing the games in the evening? Those are long drives back to there homes late at night. So they would arrive at 11 PM? Is that safe?
- What plans do you have to address we are a rural area and that late evening games are not best for students because of the distance?

District Assignment	Piece #	Piece Description	Total_Pop	Hispanic	NH White	NH Black	NH Asian	NH Others
1	1	Del Monte Forest	1,067	59	719	28	213	48
1	2	DMF - CW connector (1 block)	127	4	116	3	3	1
1	3	Carmel Woods	382	21	299	6	44	12
2	4	CBTS: NW Carmel	778	43	684	7	33	11
1	5	NW Carmel north	106	4	89	3	2	8
2	6	CBTS: NE Carmel	878	59	736	11	49	23
1	7	NE Carmel east	193	28	128	4	16	17
1	8	NE Carmel north	534	69	381	7	47	30
2	9	CBTS: Forest Hills Park	0	0	0	0	0	0
2	10	CBTS: SW Carmel	1,064	54	933	3	38	36
2	11	CBTS: SE Carmel	413	34	356	0	12	11
2	12	SE Carmel northeast	39	10	21	0	6	2
2	13	CBTS: Hatton Fields	9	0	9	0	0	0
2	14	Hatton Fields east	867	55	698	1	83	30
2	15	CBTS: Carmel Point	82	4	75	0	2	1
4	16	Carmel Point west	408	39	305	7	32	25
2	17	CBTS: Larson Field	0	0	0	0	0	0
2	18	Mission Fields	479	43	359	2	55	20
1	19	Carmel Hills/Carmel High School	460	23	390	0	44	3
1	20	High Meadows + Rancho Rio Vista	1,333	61	1,037	22	170	43
3	21	NW of Carmel Vly Rd & Canada De La Segunc	776	23	703	4	29	17
1	22	Crossroads & Barnyard Malls	471	54	358	5	31	23
3	23	Palo Corona Regional Park north	40	5	28	0	6	1
3	24a	Quail Lodge Golf Club east	100	5	87	0	3	5
3	24b	Quail Lodge Golf Club east	367	40	266	4	44	13
4	25	Quail Lodge Golf Club west	255	18	218	0	13	6
3	26	NW of Carmely Vly Rd, east of Tehama	1,399	87	1,198	5	72	37
3	27	Valley Hills	254	16	217	0	15	6
3	28	Carmel Valley High School	583	31	476	17	22	37
4	29	Carmel Estuary	0	0	0	0	0	0
4	30	Mission Fields, south of Carmel River	7	1	5	0	0	1
4	31	Carmel Meadows	195	2	180	0	10	3
4	32	Point Lobos	46	14	28	2	0	2
4	33	Carmel Highlands	694	43	591	8	29	23
4	34	Point Lobos Ranch, SE of Hwy 1	27	9	10	0	6	2
4	35	Hacienda Carmel	467	40	400	6	8	13
3	36	Santa Lucia	460	69	346	2	18	25
3	37	Penon Peak Trail	19	2	14	0	0	3
3	38	Carmel Valley Ranch Golf Club + south	538	15	483	4	30	6
5	39	Carmel Valley Village, south of river	1,329	171	1,034	11	62	51
5	40	Carmel Valley Village, north of river	3186	310	2603	27	109	137
4	41	Notleys Landing + Carmel River ESAA south	356	40	293	2	7	14
4	42	West of Rancho San Carlos Rd	27	4	17	0	4	2
3	43	The Preserve Golf Club + east	103	15	68	3	3	14
4	44	Big Sur/Captain Cooper ESAA	935	286	587	4	9	49
4	45	Cachagua	1008	240	679	10	30	49
4	46	East of CVV & NE of E Carmel Vly Rd	110	38	66	0	0	6
Totals			22,971	2,188	18,290	218	1,409	866

## Response to Letter 14-2-d, Bud Get

1. This comment letter is about the proposed project objective to “provide the capability to host sport events and games for Carmel High School students in the evening when students, parents, and community members can more easily attend.” See response to Letter 2b, comment 1.

This comment also seeks information regarding the demographics of students and athletes at Carmel High School, and concerns for minority students and those living in rural areas. However, purported economic and social effects of the project that are not related to physical impacts are not treated as effects on the environment under CEQA, and need not be addressed in an EIR. (CEQA Guidelines, §§15131(a) & 15358(b).) Consistent with Board Policy 6145: Extracurricular and Cocurricular Activities, no students would be prevented from or limited by participation in any school-sponsored extracurricular or cocurricular programs or activities on the basis of any actual or perceived characteristic listed as a prohibited category of discrimination in state or federal law as a result of the proposed project. No further response is required and no changes to the RDEIR are required.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Tue, Oct 4, 2022 at 10:42 PM

Subject: RDEIR: Appendix J VMT (PAGE 7)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

On Page 7:

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

Question:

- How do you know 500 attendees are at football games? What is the validation of attendees?
- You indicated MPC as a site. What has attendance record been there vs. CHS vs. Pacific Grove High School?
- What is the seating capacity at MPC?
- What is the seating capacity at PG High School?
- What is the parking capacity at MPC?
- What is the parking capacity at PG?
- What features are better or worse at each of the campuses compared to CHS?

2

If one of your stated goals is: Operate an athletic stadium facility that is at least equal with most other local high schools, including the ability to conduct events in the evening

- What features do the other local high schools have that are better than CHS?
- Given you've expanded the definition of the RDEIR to "athletics" stadium to include pool, do others have pools and/or baseball batting cages?
- Is that stat accurate - \$17K available per student - twice what MPUS has per student?
- Aren't the lights a luxury better spent on education to benefit all students/

3

Candidates for the Carmel Unified School District don't have to worry much about the district's budget.

With more than \$17,000 available per student — twice what Monterey Peninsula Unified has per student — the district has the freedom to explore educational luxuries not available to other districts, such as a multi-faceted Green Building at the middle school and an Olympic pool at the high school.

But the four candidates running for the district's three open seats see some challenges for Carmel's educational system, such as utilizing its lofty budget to raise the bar of academic excellence.

Trustees Amy Funt, Annette Yee Steck and Marcy Rustad are trying to retain positions on the board. If any of the three were to lose out, it would be to Richard Kreitman, a financial planner with two sons in the district.

All emphasize student achievement as the district's primary objective, while all cite above-average substance abuse among older students as a primary concern.

Funt, a full-time mother who has served on the board for eight years, is running for her third term. As the board president, Funt points to running a successful campaign for the district's \$21.5 million bond, which will provide the high school a new library and a performing arts theater, as an

## Response to Letter 14-2-e, Bud Get

1. The commenter is questioning the number of attendees historically at Carmel High School games that are played during the afternoon or off-site at Monterey Peninsula College or Pacific Grove High School for postseason games. This is based upon ticket sales and staff's historical observations of students, players, coaches, and staff that are not required to purchase tickets.

The seating and parking capacity at Monterey Peninsula College and Pacific Grove High School are not relevant to evaluating the environmental impacts of the proposed project. This comment does not raise an environmental issue and therefore, no further response is necessary.

2. The commenter asks about features at other local high schools. This comment does not raise an environmental issue and therefore, no response is necessary.
3. The commenter concerns the district's budget and upcoming Board elections. This comment does not raise an environmental issue and therefore, nor response is necessary.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Tue, Oct 4, 2022 at 10:28 PM

Subject: RDEIR Feedback: Stated Objective: Improve your traffic circulation (Photo of limited one way car flow)

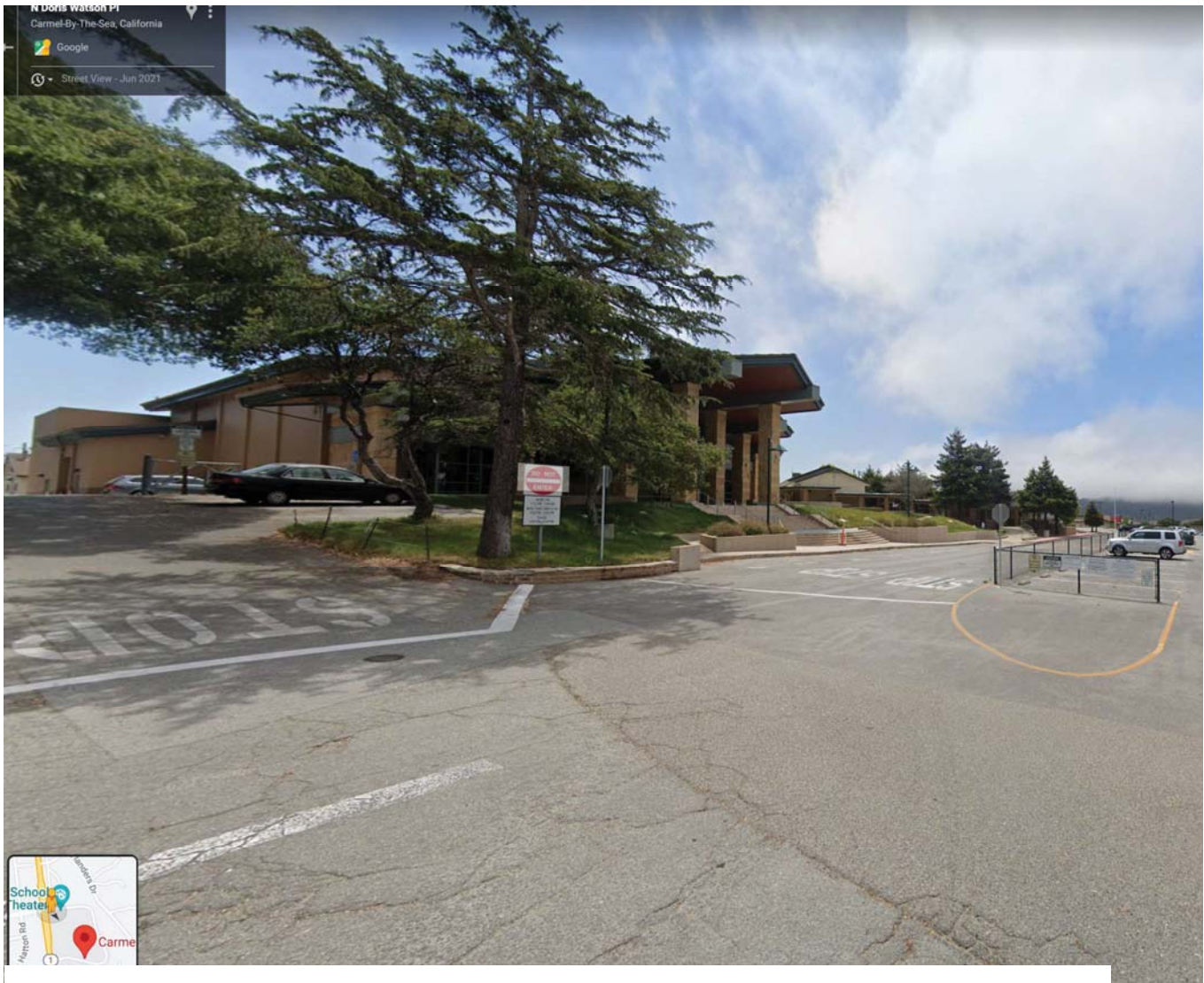
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

**One of your stated objectives is to improve traffic circulation. Can you please describe the current state?**

- Photo of the entrance shows limited one lane flow each way.
- Do you have historical traffic studies and or recommendations on circulation improvements from the when the Performing Art Theater was built? What was recommended by Keith Higgins? What you implemented over the years to improve circulation on-camps and overspill to Highway 1 and neighbors?
- Can you describe your current conditions? Our perception is you don't have safe traffic circulation. This whole area a mess during school sessions. No amount of new parking spaces will solve this.
- Are you currently violating any safety issues?
- Do you have an Emergency Access Route?
- Is there a standard of amount of cars that should be allowed to be on-campus for that harsh left turn to the light?
- Why aren't there safe walkways for students? No safe crossing either?
- Have you outgrown your capacity for CHS? How is that determined?



## Response to Letter 14-2-f, Bud Get

1. The commenter implies that current on-site access and circulation is not safe, but does provide any evidence.

Regarding emergency access, all internal roads provide access to State Route 1. The internal loop road is the fire access road. The high school site has three locations that provide access to the back of campus for emergencies - the road near the stadium, the road near the Performing Arts Center, and the fire lane near the library at the center of campus. All internal roads provide access to State Route 1.

Pedestrian versus automobile incidents at the high school are rare. There have been two incidents on campus in the past 15 years. In both cases, a car rolled over a pedestrian's foot, which does not indicate that access and circulation at the campus is unsafe.

The project includes the following improvements to on-site access and circulation:

- Two new parking areas with 111 total spaces, allowing staff to close the gates to the back of campus to vehicular traffic once the school day has begun;
- Improves conditions near the lower entrance to the main parking lot allowing better flow of traffic from the highway and improving turning into the northbound traffic lane of the parking lot. This includes removal of the southernmost spaces and installation of a curb. A large vehicle parked in that location under the current configuration could prevent buses or emergency vehicles from making the turn into the northbound lane of the parking lot;
- Vehicles that currently park on the ring road near the gym will now park in the new parking lot east of the pool facility; and
- Addition of one ADA space to be located north of the pool.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 6:07 AM

Subject: RDEIR: Assessing Alternative #3 After Dark Games and Practices at MPC and/or PGHS

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 **PAGE 371: You State: 18.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE CEQA Guidelines section 15126.6(e)(2) states that if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.**

**We have further questions on how you assessed Alternative #3.**

- In order to properly compare your proposed project against any alternatives, we challenge that you have not accurately captured the environmental impact of your proposed project. Examples include:
  - Why are your roll-ups and inputs including only "worst-case" scenarios in the proposed project? Shouldn't it accurately include all games that are moving to CHS not just the six football games as a worse-case scenario. Why aren't you including "accurate base scenario"?
  - Wouldn't it be more accurate to go back and input all the games (not just 6 foot ball games) throughout your analysis?

- 2
- PAGE 377: Why are you showing Project Objectives? Doesn't the CEQA process require ENVIRONMENTAL IMPACT only as a requirement? Why are you combining Project objectives with the CEQA measurements?
  - Given your Project Objectives lack any measurable facts and are completely new from the RDEIR to just suit your outcome, would it be fair to remove the chart on Page 377?

Carmel High School Stadium Improve

Environmental Impact	Level of Impact				
	Proposed Project	Alternative #1 No Project – No Late Start	Alternative #2 No Project – With Late Start	Alternative #3 After Dark Games and Practices at MPC and/or PGHS	Alternative Local (Carmel M School
Project Objectives	All 14 Objectives Met	No Objectives Met	One Objective Met	Two Objectives Met	Seven Objec Met

SOURCE: EMC Planning Group 2022

NOTE: NI – No Impact; LTS – Less Than Significant; LTSM – Less-Than-Significant with Mitigation; SU – Significant and Unavoidable

3

**In our assessment, Alternative #3 is far environmentally superior than any of the alternatives on the table:**

- Historical basis might be needed for environmental input. How many games has CHS held at either MPC?
- Can we see the communications referenced to understand how CHS posed the questions (PAGE 349) What were the conflicts at each school and why can't they be resolvable?
  - PGUSD sports teams would be given priority for home games and any dates where home games would be played by both school districts would require Carmel High School sports teams to play at either 7:30 P.M. or 9:30 P.M. **(Lauralea Gaona, PGUSD, e-mail message, October 26, 2021).**
  - MPC staff indicated that their lighted stadium would not be available until 8:00 P.M. on Tuesday, Wednesday, or Thursday, and not until 6:00 P.M. or 6:30 P.M. on Monday and Friday, if not being used by other outside organizations **(Wendy Bates, MPC Athletic Director, e-mail message, November 11, 2021).**

4

You said This alternative would not meet the following project objectives:

***Stated Objective: Provide an enhanced learning environment for both physical education and afterschool sports activities that meets contemporary standards of education and improves the District's athletic program for its Carmel High School students and other students in the District;***

- Isn't the MPC facilities far superior than anything CHS could build for its ridiculously small campus? Can you please provide the comparison of lighting specs, turf, bleachers at both MPC and PG? Wouldn't that be a fair assessment of contemporary standards of assessment?

5

***Stated Objective: Provide athletic facilities that facilitate implementation of the State's "late start law without disruption to the District's existing educational and athletic programs;***

- If you are going to continue using Late Start in a CEQA process, shouldn't you include the details of all the work streams associated as accurate inputs for decision makers to be informed?
- Can you please insert all the board presentations on Transportation, etc from this landing page. <https://www.carmelunified.org/domain/776>.
- If the report above shows lack of ability to bet busees and drivers for Late Start, how are you getting buses and drivers for your Traffic Mitigation Plan?
- Also, can you outline CUDS's promises from the Special Meeting held and recorded on YouTube promising for removal of Late Start from approval of stadium lights: <https://www.youtube.com/watch?v=3JaOKAzVO8g>

6

***Stated Objective: Operate an athletic stadium facility that is at least equal with most other local high schools, including the ability to conduct events in the evening;***

- You can't say this alternative doesn't meet your objectives if you aren't providing a matrix of comparing parking, lights and other features in each campus?
- Can you provided what does MPC and PG have compared to what you are proposing to build?

7

***Stated Objective: Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds;***

- How can you say Alternative 3 doesn't meet your objectives if you aren't providing details on the current state at CHS across all these areas?
- What is your current fire and emergency vehicle access plan and how will your proposal improve it?
- What is your current on-campus traffic circulation (which is different than parking spaces)? How are you determining what is an improvement?
- How does your current state of traffic circulation and fire and emergency vehicles access compare to MPC and PG?

8

**WOW: it appears that MPC is a far superior stadium than CHS could ever build!**

- More info please! The Pappas-Phillips Community Stadium is a 3,000 seat stadium with a FieldTurf mono-filament playing surface for football and soccer. It is surrounded by a Rekotan all-weather 8 lane track surface.
- Can you provide head-to-head comparisons on the stadium lights with MPC; why build more light pollution in a SENSITIVE area - just use MPC!

## Response to Letter 14-2-g, Bud Get

1. This comment is regarding Alternative 3, After Dark Practices and Games at Alternative Locations (Monterey Peninsula College and Pacific Grove High School), as discussed in Section 18.0, Alternatives, of the RDEIR beginning on page 18-8.

It's not clear what the commenter means by roll-ups and inputs. Therefore, no response is necessary.

Regarding "include all games that are moving to CHS not just the six football games as a worse-case scenario." It's not clear what this comment means. There are no games moving from anywhere to Carmel High School. As noted in Section 3.0, Environmental Setting, page 3-20 of the RDEIR, "In the past, high attendance home football events have occasionally been held at Monterey Peninsula College at night." Additionally, the text of Alternative 3 was searched for the word "six" and there was no reference to six games. Therefore, no response is necessary.

2. This comment is regarding page 377 of the RDEIR PDF, which is page 18-37 of the RDEIR and the end of Table 18-1 Comparison of Alternatives to the Proposed Project. The commenter is questioning why the project objectives are considered in the comparison of project alternatives. CEQA Guidelines section 15124 (b) requires the following in the EIR project description, "A statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits." Guidelines section 15126.6(a) requires "a description of a range of reasonable alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. It also requires an evaluation of the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation."

It must be clear that whether the alternatives meet the project objectives is not factored into the environmental ranking of the proposed project and alternatives and the determination of the environmentally-superior. However as required by CEQA, as presented above, it is necessary to identify how, if at all, each alternative meets the project objectives.

3. Regarding the environmentally superior alternative, as presented in Section 18.0, Alternatives, in Table 18-1 Comparison of Alternatives to the Proposed Project, Alternative 2, No Project with Late Start is the environmentally-superior alternative.

Alternative 3, After Dark Practices and Games at Alternative Locations (Monterey Peninsula College and Pacific Grove High School) was ranked #4, equal to the proposed project. The email communications between school district staff and the other schools' staff can be obtained through a Public Records Act request.

4. The commenter provides his opinion about this project objective, but does not raise an environmental issue. Therefore, no response is necessary.
5. The reason bussing Carmel High athletes to PGHS and/or MPC for practices after 7:00 for several months during the year is not a feasible alternative is present on page 18-19 and 18-20 of the RDEIR. Hiring bus drivers two to three times per year associated with implementing the Traffic Management Plan would be feasible.

The comment states that the district promised the "removal of Late Start from approval of stadium lights." While an objective of the proposed project is to "provide athletic facilities that facilitate implementation of the State's 'late start law' without disruption to the District's existing educational and athletic programs" (RDEIR, p. 4-1), implementation of late start is not tied to project approval.

Other comment made here are not about the RDEIR and therefore, no further response is necessary.

6. As discussed in Section 18.0, Alternatives, Monterey Peninsula College and Pacific Grove High School both have lighted stadiums that are operated by Monterey Peninsula Community College District and Pacific Grove Unified School District, respectively. Other campus features can be observed in Figures 18-1 and 18-2. No changes to the RDEIR are necessary.
7. The commenter raises concerns about on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student staff, and visitor access within the high school campus grounds. The proposed project includes an additional 111 parking spaces and related access improvements. See also response to Letter 14-2-f.
8. The commenter favors the use of Monterey Peninsula College lighted stadium for Carmel High School practices and games and implies that lighting the stadium at the college would not result in the same lighting impacts as lights would at Carmel High School. (It should be noted here that the stadium lights at the college are only on when the stadium is in use.) The lights would be on the same number of hours at either location, so the lighting impact would be the same, only at a different location. The commenter expresses his opinion that light pollution at the high school environs is more sensitive than light pollution at the college environs. See Section 18.0, Alternatives, for a discussion about this alternative.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 4:07 AM

Subject: RDEIR Feedback: Photo = Intersection of Scenic Highway 1 plus CHS Entrance and NO SAFE crosswalk. To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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One of your objective is:

- Page 71: Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds

**Questions:**

- The entrance to CHS doesn't have a safe crosswalk. Why is that?
- Have you considered installing a safe crosswalk to help with campus security and safety?
- Can you describe what campus and safety security measures you have in place?
- Should your assessment include auditing school zone markings, safety signs?
- Should you hire a permanent crossing guard?
- What is the width of the entrance?
- Why does it only have one car entrance?







## Response to Letter 14-2-h, Bud Get

1. See response to Letter 14-2-g, comment 7 and response to Letter 14-1-m, comment 1, above.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 4:32 AM

Subject: RDEIR Feedback: KOPs from Public Spaces

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>,

<[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 Why are your KOPS and photos not inclusive of more public spaces that will be scared from the installation of the stadium lights?

Please provide KOPs from public spaces that include the walks around the track. That is a public space and many members of the community do daily walks.

What will the stadium light poles look like against the Santa Lucia Mountains?

The attack on the visual aesthetics are not fully transparent in your photos or your write-up.

Please show impacts from all angles.

What will I see on my daily walks?



## Response to Letter 14-2-i, Bud Get

1. See response to Letter 2b, comment 2. The commenter also states that the Carmel High School track is “a public space and many members of the community do daily walks.” However, the track is part of the Carmel High School campus, which is owned and operated by the district for the district’s educational and athletic programs. While the track may be utilized by the public in accordance with the Civic Center Act when not in use for school purposes, those wishing to enter district grounds must do so in accordance with applicable law and Board Policy. No changes to the RDEIR are needed.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 4:28 AM

Subject: RDEIR Feedback: Scenic Highway 1: Protected by Corridor Program (photo from this point) To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[info-d5@dot.ca.gov](mailto:info-d5@dot.ca.gov)>, <[christopher.bjornstad@dot.ca.gov](mailto:christopher.bjornstad@dot.ca.gov)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

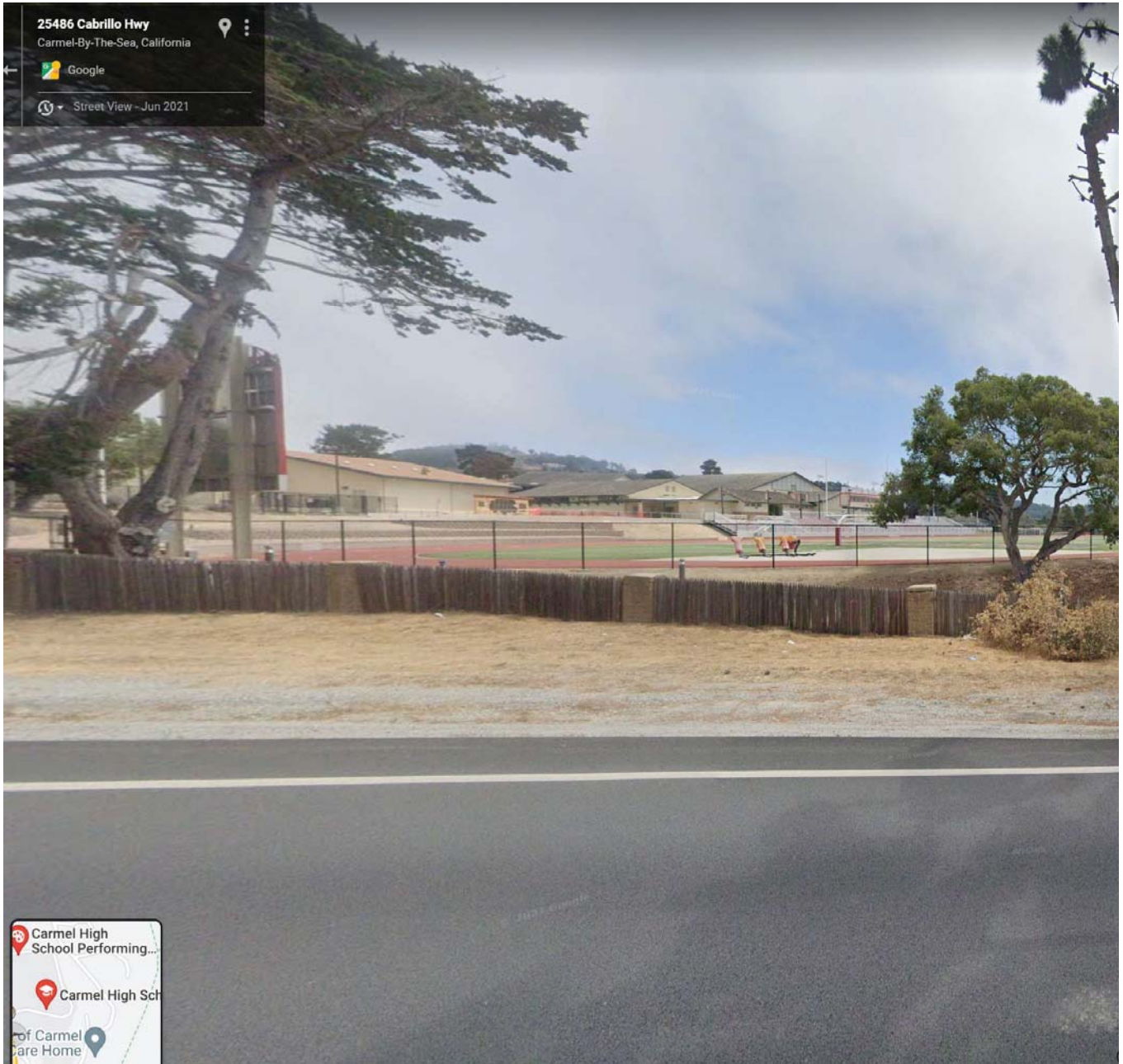
1

All of your KOPs are deliberately misleading. You've deliberately selected points that only show the minimum impact. Your DEIR stated that there is a stretch on Scenic Highway 1 (Protected by Corridor Program) that you visibly can see the stadium during the day.

**Questions:**

- We'd like to see a visual simulation of what the stadium poles will look like during the day and night from this angle and point.
- It's standard practice in construction to put up a visual marker before construction. We require you PUT UP STORY POLES AND/OR BALLOON for a fully informed decision of what the community will see and to have the board members see the scar they will be approving.
- How does installing stadium lights from the point not violate the Corridor Program?
- Show everyone the honest truth of what you are building.
- Is Caltran's responsible for holding you accountable to uphold the guidelines for the Corridor Program?
- Have you clearly informed Caltrans that this project is smack in the middle of the Corridor Program?
- What visual quality protection measures are you taking to protect this view?
- Who is your contact at Caltrans that is approving through the lens of the Corridor Program?
- What sections of the Corridor program will you be violating?
- Why aren't you conducting SREs and VIAs on this project?
- Why aren't you requiring early coordination with the Project Development Team (PDT) and representatives from the community?

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## Response to Letter 14-2-j, Bud Get

1. Regarding the location of the KOPs, see response to Letter 2b, comment 2. Regarding story poles, see response to Letter 2c, comment 1. Regarding the visual impacts to State Route 1, see Section 5.0, Aesthetics, of the RDEIR.

Regarding Caltrans, Caltrans received the Notice of Preparation and submitted a response, which is included in Appendix A of the RDEIR. Caltrans did not express concern regarding the proposed lighting. Caltrans received the original draft EIR. They provided only one comment, “Caltrans appreciates the mitigation measures put in place to reduce traffic for home football games on local roads and State Route (SR) 1. The parking demand measures will help meet statewide goals of reducing both vehicle miles traveled (VMT) and greenhouse gasses (GHG’s). We look forward to the school district passing the traffic control management plan before the first game.” Caltrans also received the RDEIR, and did not provide a comment letter. No changes to the RDEIR are necessary.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 4:38 AM

Subject: RDEIR: Feedback on Viewing Platform (Photo and where will the two hook-up)?

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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We are unable to provide feedback on the viewing platform as the design is unstable and influx. It appears to be an old design from a previous rejected consideration.

- What are the specs?
- How do they tie into the existing bleachers?
- What is the safety walkway between the two?
- What is the Emergency Access Route to exit the stadium (current) and then proposed with the increased attendance?
- This current walk off the bleachers looks dangerous? What is the safety plan to make this more walk-able?
- What is the grade of this section?
- How will drainage impact the homes on Morse if you do construction here?
- Why isn't there a walk-path marked on the road? Your stated goal is to increase safety?
- How will you direct 2,000 attendees at this point? It looks unfinished and dangerous even now.



## Response to Letter 14-2-k, Bud Get

1. This comment is about safety concerns with respect to existing conditions at the bleachers and the design of the proposed storage building and viewing platform, and raises one environmental issue about drainage impacts on Morse Drive, which is located approximately 600 feet southwest of the location of the proposed storage building and viewing platform. Drainage is addressed in Section 12.0, Soils, Erosion, and Water Quality of the RDEIR. See also response to Letter 14-1-w, comment 2, and response to Letter 14-1-g, comment 6. A description of the proposed viewing platform is set forth in the RDEIR in Subsection 4.2, and depicted in Figure 4-5 of the RDEIR.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 4:52 AM  
Subject: RDEIR Feedback: Stadium Light Poles Visibility During the Day?  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

What happens if you install stadium lights and it becomes challenging for night games? Will there still be day games? What will be the visibility of stadium light poles during the day from inside the stadium? If indeed players decide to hold day games, what do the stadium poles look like from the public space inside the stadium against the Santa Lucia Mountains? We'd like more visual simulation of what the public can expect to see from this KOP. Will you be installing story balloons and pole before the construction so the public can anticipate the visual impact for an informed decision? Why or why not? Isn't the Santa Lucia Mountain Range beautiful? This is what you'll be marking in the day-light during my walks as this is also a public view that should be included in your visual aesthetic assessment.



## Response to Letter 14-2-I, Bud Get

1. Regarding the location of the KOPs, see response to Letter 2b, comment 2. Regarding story poles, see response to Letter 2c, comment 1. Regarding the visual impacts to State Route 1, see Section 5.0, Aesthetics, of the RDEIR.

----- Forwarded message -----

Letter #14-2-m

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 5:00 AM

Subject: RDEIR FEEDBACK: Table 4-3 Stadium and Pool Lights on TOGETHER

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 On PAGE 104 you provide the : Table 4-3 Proposed Stadium and Pool Facility Lighting Schedule

The combination of both Stadium and Pool lights on together are not discussed, shown or measured in any way throughout the RDEIR.

In Essence, for an accurate environmental impact won't you have to expand all of Appendix C, Lighting Data to show the combination of light pollution when they are both on! Light spills, etc What will be the impact on Scenic Highway 1?

Also, why not revise the chart to show cumulative impacts clearly? You are deliberately making this hard to read and have people see the overlaps in days, times and

- Why not provide a roll-up by month on the number of days both will be on? Can you confirm that total?
- Can you confirm what is the total number of days both lights will be on?
- Why isn't this data into the last section of cumulative impacts? You can't isolate - it's cumulative?
- Can you indicate the total number of students that will be on campus simultaneously for this chart? Can you provide the sports?
- How does this roll-up to the 44 games in your Mitigation Measures? We are not seeing how the total games in Mitigation measures intersect with all your charts?

Table 4-3 Proposed Stadium and Pool Facility Lighting Schedule

Month (Number of Days with Lights in Use)	Start Time (Range)	End Time
<b>Stadium</b>		
August (3 days)	7:08 P.M. – 7:11 P.M.	8:00 P.M.
September (21 days)	6:23 P.M. – 7:07 P.M.	8:00 P.M. (10:00 P.M. for two Friday night football games)
October (16 days)	5:42 P.M. – 6:18 P.M.	8:00 P.M. (10:00 P.M. for one Friday night football game)
November (16 days)	4:21 P.M. – 5:40 P.M.	7:30 P.M. (10:00 P.M. for one Friday night football game)
December (17 days)	4:20 P.M. – 4:25 P.M.	7:30 P.M.
January (16 days)	4:38 P.M. – 5:01 P.M.	7:30 P.M. (8:00 P.M. on January 30-31)
February (15 days)	5:02 P.M. – 5:30 P.M.	8:00 P.M.
March (23 days)	5:31 P.M. – 6:59 P.M.	8:00 P.M.
April (15 days)	7:01 P.M. – 7:23 P.M.	8:00 P.M.
May (5 days)	7:26 P.M. – 7:29 P.M.	8:00 P.M.
<b>Pool Facility</b>		
August (18 days)	7:08 P.M. – 7:38 P.M.	8:30 P.M.
September (21 days)	6:23 P.M. – 7:07 P.M.	8:30 P.M.
October (16 days)	5:42 P.M. – 6:18 P.M.	8:30 P.M.
November (4 days)	5:37 P.M. – 5:40 P.M.	8:30 P.M.
December (0 days)	No Pool Lighting Needed	No Pool Lighting Needed
January (2 days)	5:00 P.M. - 5:01 P.M.	6:15 P.M.
February (15 days)	5:02 P.M. – 5:30 P.M.	6:15 P.M.
March (8 days)	5:31 P.M. – 5:40 P.M.	6:15 P.M.
April (0 days)	No Pool Lighting Needed	No Pool Lighting Needed
May (0 days)	No Pool Lighting Needed	No Pool Lighting Needed

SOURCE: CUSD 2022

NOTE: Number of days and times are approximate and are subject to minor alterations.

## Response to Letter 14-2-m, Bud Get

1. This comment is regarding the cumulative impact of both the pool facility lights and the proposed stadium lights being on at the same time. Section 5.0, Aesthetics, of the RDEIR addresses the cumulative visual impacts of the pool facility lights, the proposed stadium lights, and the proposed new parking lot lights. The nighttime visual simulations include all three. Appendix C to the RDEIR includes data regarding the pool lights and stadium lights individually and cumulatively. Table 4-2, Proposed Schedule of Stadium Uses, sets forth the number of participants by sport anticipated after implementation of the proposed project. The months of each sport's season are included on Table 4-2, and can be compared with the Month column at Table 4-3.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 4:47 AM

Subject: RDEIR Feedback: Photo of Ocean Ave Intersection with Scenic Highway 1 (Backed up traffic congestion)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)> \_\_\_\_\_

1 You've spent a lot of time assessing the neighborhood on the East Side of Highway 1 but you've limited the scope of the project on the west side of Highway 1. This project will increase traffic and safety challenges on the east side of Highway 1. Please provide equal amount of attention to the East Side. This photo shows the type of traffic and congestion that backs up on Ocean Ave (you can see the Performing Art Center). You can also see the school bus in this congested area.

- What is your Traffic Management Plan for the neighborhood on the East Side of Highway 1?
- What is the parking opportunities and challenges? Why haven't you expanded the Neighborhood Parking Assessment (Appendix B) in the same mile radius on the West Side? We require the same approaches and deliverables for all the residential areas within 5 miles.
- Traffic is consistently backed up (this is less than one block from school) yet you encourage walking?
- What is your current safety plan around the school?
- Your indicate you want to improve traffic circulation, what is the current flow?
- Where are safe crosswalks?



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## Response to Letter 14-2-n, Bud Get

1. Regarding east and west of State Route 1 and the Traffic Management Plan, see response to Letter 2b, comment 3. For a discussion of traffic circulation, please refer to Section 11.0, Transportation and Parking, of the RDEIR.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 5:08 AM

Subject: RDEIR Feedback: Stadium Improvements should Include Baseball Fields and Students (wide view of dangerous stairs)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 **PROBLEM:**

RDEIR has significantly increased its scope of work from the draft EIR. This in itself should immediately halt the project and trigger a restart back to Scoping Session and Notice of Preparation. We'd like to understand if this is legal what you are doing? You've added entire new projects and NOT addressing the comments from the DEIR.

2

- You've changed the title and scope to "stadium improvements" so why have excluded a significant portion of the campus that should be part of the stadium improvement, the baseball field and the associated students using this part of the stadium athletic improvements?
- Isn't it appropriate to include the IMMEDIATE adjacent baseball fields and students part of this discussion because you are defining the swimming pool as part of the stadium improvements and that location is further away from the track field?
- It doesn't appear CUSD has proper planning of long-term growth at the high school campus. If you are going to rip-off the band-aid to assess athletic improvements, why not do it right and take a long-term comprehensive view?
- Should the RDEIR take a look at the bigger vision and planning through the thoughtful process of revisiting the Facilities Master Plan? RDEIR feels a bunch of initiatives stuck together versus a thoughtful plan.
- When is the Facilities Master Plan scheduled for a revisit?

**Questions on Mitigation Measures:**

- Why not include transparency and inclusion of the baseball team in the athletic stadium assessment: Schedules, number of students? We'd like to see the big picture planning. Have you done this? Why or why not?
- Why shouldn't Inclusion and option of using the baseball field as an alternative to parking lots versus the Tennis courts (transparency of what is wrong with current tennis courts and cost to fix).
- Inclusion of baseball students in the VMT/Energy/GHG analysis and comparative to the other groups; football, tennis, softball, soccer
- Why can't we see options and evaluation to fix, update and connect the baseball field to the back-side of the stadium **(see photo of current disaster - stairs in need of repair that walk up to the stadium field - is this even safe?)**
- Why can't the stairs be fixed as usable stairs to the stadium at the upper level? Why can't the baseball fields be parking lot vs. tennis courts? Have you considered moving the baseball fields to CMS?



## Response to Letter 14-2-o, Bud Get

1. The commenter questions the legality of increasing the scope of the project description from the original draft EIR. The scope of the project description was revised to address public comments received on the original draft EIR, as discussed in Section 1.1 Purpose for Preparing a Revised Draft EIR, of the RDEIR. The school district followed the process for revising and recirculating a draft EIR, pursuant to CEQA Guidelines section 15088.5, Recirculation of an EIR Prior to Certification. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.
2. The commenter requests that additional improvements consistent with the school's facility master plan be made at the campus and addressed in the EIR, specifically at the baseball field. Changes to the baseball field are not included in the project description and are outside of the scope of the RDEIR. The commenter also suggests updating the facility master plan, which was prepared in 2019.

The commenter questions why the pool facility is included in the project description. The proposed project includes retrofitting the existing pool facility lights in order to reduce their impact in response to comments received on the original draft EIR.

The commenter suggests building a new parking lot on the baseball field instead of on the tennis courts. While this alternative would provide more parking than would be provided on the tennis courts, this alternative would result in greater environmental impacts, associated with players being transported off site for practices and games. As discussed in the RDEIR, removing the tennis courts would require the tennis teams to practice off-site at the existing tennis courts at Carmel Middle School. The tennis teams (approximately 48 players – refer to Table 4-5 Proposed Off-Site Practices and Games in the RDEIR) currently play home matches off-site and that would continue with implementation of the proposed project. The season is 13 weeks. The boys' baseball team includes approximately 54 players (freshman, JV, and varsity – 2021-22 roster). The season is 17 week or more, generally February 1 through mid-May. Playoffs can extend into June beyond the school year. All practices and home games are played on this baseball field. The girls' softball team currently practices and plays home games off-site at Carmel Middle School so there would be no change associated with girls' softball. Please also refer to response to Letter 14-1-g, comment 4.

Therefore, more team members would need to travel off site for a longer period of time. Therefore, construction a permanent parking lot on the baseball field would result in greater environmental impacts compared to the proposed project.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 5:15 AM

Subject: RDEIR: Underestimate the Significant and Unavoidable Impacts to Biological Resources

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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We believe that CUSD and the RDEIR is misleading and underestimating the Significant Impacts to the Biological Resources. The NOP marks two areas as Significant Impact (shown in image below), yet little work or follow up in the RDEIR has been done to warrant changing the status to "less-than-significant".

You acknowledge the geographic scope for assessment of cumulative aesthetics, air quality, biological resources, energy, greenhouse gas emission, soil erosion and water quality impacts is the unincorporated areas within the State Route 1 corridor, including the project site, including portions of Hatton Canyon, the City of Carmel-by-the-Sea, and other unincorporated areas within Carmel Valley. This scope boundary was selected because it identifies the areas where the project may impact cumulative impacts across all the areas. However, NO in-depth analysis, zoning, ordinances, or any other measure was included. Thus, RDEIR is underestimating the impacts.

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- Why not acknowledge and include the impact to Biological Resources in context to Hatton Canyon Park and the lost lawsuit from 1996? PDF is attached.
- Why not include and acknowledge the chronic challenges and history of traffic on California Highway 1?
- Is your increased game attendance built off a foundation of an already challenged traffic flow?
- Have you done the due diligence and can confidently say that will not be violating the below National Environmental Policy Act?
  - *The National Environmental Policy Act, 42 U.S.C. §§ 4321 et seq., declares a broad national commitment to protecting and promoting environmental quality. 42 U.S.C. § 4331. The primary mechanism of NEPA is the Environmental Impact Statement, or EIS. 42 U.S.C. § 4332. The EIS's requirements are procedural, not substantive, and are designed to ensure that an agency takes a "hard look" at the environmental consequences of its proposed action, and to make information on the environmental consequences available to the public. Robertson v. Methow Valley Citizens' Council, 490 U.S. 332, 350, 109 S.Ct. 1835, 1846, 104 L.Ed.2d 351 (1989). The California Environmental Quality Act (CEQA) is basically similar to NEPA, with similar procedural requirements. See Laguna Greenbelt, Inc. v. United States Dep't of Transp., 42 F.3d 517, 522 n. 1 (9th Cir.1994).*

Initial Study

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con't.

#### 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"/>

Can you provide an update on this snapshot below? What are the new stats for the CA transportation vehicles? Aren't these stats dangerous benchmark for you to continue building on the CHS campus?

Doesn't CMS as a viable alternative move this kind of traffic flow and congestion off the table? It's not present there?

The community will be spending more time to ensure you have taken all data in this e-mail into consideration. Can you provide confirmation you are not violating any local ordinances?

California State Highway 1 (Highway 1) extends from San Clemente in Orange County to Rockport in Mendocino County, California. Over an approximately three-mile stretch through the City of Carmel-by-the-Sea (City of Carmel), motorists traveling on Highway 1 confront severe congestion at peak hours. Highway 1 begins as a four-lane divided highway at the northern end of this section, near the Highway 68 interchange. As Highway 1 passes through the City of Carmel it funnels into a two-lane undivided highway, south of Ocean Avenue. Over the next several miles Highway 1 is controlled, and congested, by three traffic lights and numerous flanking intersections and driveways. The lack of sufficient left-turning lanes adds to the traffic problem.

California transportation officials list this stretch of Highway 1 as: "one of the most heavily traveled two-lane highways in the State." 7 SAR 2083. [FN1] This section of Highway 1 is also dangerous: the rate of traffic accidents in this two-lane section of Highway 1 exceeds the state average. 24 SAR 7652. In 1990, traffic reached an average of 40,000 cars per day and an average of 60,000 cars per day at one location on this stretch. 24 SAR 7650. This volume increases during weekends and the summer months. 24 SAR 7651.

**FN1.** Throughout this opinion, we cite the state and federal administrative records. State administrative record references use the format: volume number in Arabic numerals, SAR, page numbers. Federal administrative record references use the format volume number in Roman numerals, FAR, page numbers. "FR" refers to the Federal Defendants- Appellees' Supplemental Excerpts of Record; these references are cited as: FR, page number in Arabic numerals.

Highway 1's traffic problems date back to the late 1940's. No one today disputes the need for improvements; rather, disagreement centers on how best to achieve those improvements. Variations on two alternative proposals have dominated the list of solutions for forty years: (1) widen Highway 1 or (2) build a new route. The primary location identified for a new route was, and remains, Hatton Canyon, a pristine "wilderness" area east of the City of Carmel. Disagreement over these alternatives has resulted, unwittingly, in the exercise of a third option: no action.

## Response to Letter 14-2-p, Bud Get

1. This comment is regarding impacts to biological resources. The NOP noted that impacts to sensitive biological resources could be significant and that additional investigation was needed in an EIR. The RDEIR addresses impacts to sensitive biological resources in Section 7.0, Biological Resources. The commenter does not indicate how the analysis is inadequate.

Regarding evaluating cumulative impacts, CEQA requires an EIR discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable. The Biological Resources section of the RDEIR identified *potential* impacts to the following resources: hoary bat and nesting raptors and migratory birds during construction activities, and the potential for tree removal, although no tree removal is planned. Mitigation measures were presented to reduce these potential, significant impacts to a less-than-significant level. These potential impacts were also discussed in Section 15.0, Cumulative Impacts, of the RDEIR.

With respect to an analysis of local zoning and ordinances in the context of biological resources, please refer the analysis of Local Plans and Regulations starting on page 7-22 of the RDEIR, and response to Letter 2b, comment 4.

The comment refers to a 1996 lawsuit associated with a previously-proposed project to realign State Route 1 through Hatton Canyon, which is located east of the high school campus. That lawsuit is not applicable to the proposed project, and the proposed project would not have an impact on the biological resources in Hatton Canyon beyond the potential impacts discussed and mitigated in the RDEIR and summarized above. Therefore, no response is required.

2. Regarding the comments about traffic, the proposed project's impacts on vehicle miles traveled and potential traffic safety impacts were addressed in Section 11.0, Transportation and Parking.
3. The commenter asks if the school district is violating the National Environmental Policy Act (NEPA). NEPA is applicable to federal projects and projects that are receiving federal funding. NEPA does not apply to the proposed project. The proposed project was evaluated under CEQA in accordance with applicable law.
4. The commenter asks for an update to a discussion about traffic on Highway 1 included in his/her email. However, there is no source for this documentation, which does not appear to apply to the proposed project. Therefore, no response is necessary.

Regarding the Carmel Middle School alternative, Section 18.0, Alternatives, discusses the alternative of constructing a lighted stadium at the middle school.

Regarding the violation of local ordinances, as allowed by law, the school district has exempted itself from local ordinances. See also response to Letter 2b, comment 4, and response to Letter 11b, comment 16.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 5:33 AM

Subject: RDEIR Feedback: Baseball Gate Entrance: Emergency Access Routes

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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You state one of your objectives is: Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds;

Questions on Mitigation Measures:

- Can you provide the current state of on-campus traffic circulation, fire and emergency vehicle access?
- How would your proposals specifically improve current conditions?
- How are you defining on-campus traffic circulation? Is that different than parking needs?



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- Is the above location, the gate entrance of the baseball field violating any encroachment permits? What is the width of the entrance? What are the fire and emergency access limitations? Seems dangerous?
- Why is the baseball field not part of the definition of "improving" athletic fields?
- This photo shows the narrow opening at the top where cars are parked and pedestrian is being challenged.
- Your new scope of work should very little details or specs how this section would be impacted.
- Where would the Emergency Access Route be?
- Our neighbors provided us photos of your work being done on possible encroachments. Can you update us why this is being done and the status?
- Our neighborhood was shocked on the noise coming from the batting cages you installed without telling us - what are you planning that we should be aware of?

**EXHIBIT "A" – AREA OF BOUNDARY SURVEY**



## Response to Letter 14-2-q, Bud Get

1. Regarding this objective, see response to Letter 14-2-g, comment 7. Regarding the questions on mitigation measures, the questions don't reference any mitigation measures and they do not raise any environmental issues. Further, with respect to the questions concerning the baseball field, the baseball field is not included in the proposed project scope and thus is not the subject of the RDEIR. Please see response to Letter 14-1-g, comment 4. Likewise, past projects at Carmel High School are not the subject of the RDEIR. Therefore, no further response is necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 5:22 AM

Subject: RDEIR Feedback: Entrance to CHS and Improving Traffic Circulation is limited by No Ped Crossing (Use Crosswalk) to Front Entrance

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[rosen@carmelunified.org](mailto:rosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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On Page 293: You State:

*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.;*

- Can you describe the physical environment setting that allows you to state you will ask families and employees within one mile of campus to consider walking?
- Can you please disclose, highlight, demonstrate how that is possible?
- What would be a safe route you are asking people to take within a 1 mile radius?

PROBLEM: You are encouraging walking to events as part of your mitigation measures and yet there is VERY Limited pedestrian crossings within 1 mile radius. This photo shows the challenges on Highway 1 to get walk immediately across to the CHS Campus.

## Response to Letter 14-2-r, Bud Get

1. Regarding people walking to campus, see response to Letter 14-1-q.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 6:49 AM

Subject: RDEIR Feedback: Scenic Highway 1 (Protected Clarity of Proposed Parking Lot / Protected Trees and Protected Scenic Highway 1

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[christopher.bjornstad@dot.ca.gov](mailto:christopher.bjornstad@dot.ca.gov)>, <[info-d5@dot.ca.gov](mailto:info-d5@dot.ca.gov)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

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**This is feedback regarding: Revised Draft EIR Carmel High School Stadium Improvements SCH# 2021050293 August 24, 2022**

**Also, copied on this e-mail is CalTrans and lead Christopher Bjornstad who signed the Notice of Preparation Letter.**

While the RDEIR acknowledges that Scenic Highway 1 is Protected by Corridor Program, it provides no clarity if they are violating any terms and/or the work they are doing to uphold the guidelines of the Corridor Program.

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**Questions:**

- Do you have a boundary survey of how close CHS is to Scenic Highway 1?
- What is a visual map of the Corridor Program outlined to CHS Campus?
- For each of your proposed projects, where do they sit in comparison to Scenic Highway 1 vs. High School Property?
- Do the protected tree-lines sit on the boundary of CHS and/or Scenic Highway 1?
- Your proposed new parking lot with POLES and Lights (from ripped out tennis courts) can be seen from Scenic Highway 1. Are you violating any terms?
- Are you violating any terms of how close our project is to Scenic Highway 1? Wasn't 100 feet set-back a requirement? Are you violating this?
- Will you be conducting a Visual Impact Assessment to the requirement of the guidelines for Scenic Highway 1? Will they be visual simulations or photo simulations? Will those be submitted to Caltrans? Who will they be sent to at Caltrans?
- How will you determine if you are violating guidelines?
- The Caltrans letter from Chris indicates the process for encroachment Permit. Doesn't the new proposed parking lot ripping out tennis courts sit on Caltran's right of way? What is the next step and timeline if you have permission to do this? Without permission, the Final EIR can't be approved?
- Can you provide all specs from this project? Where is the Emergency Access Routes?

The RDEIR does not provide details of how close the protected trees, Scenic Highway 1 and proposed new parking lot (ripped out tennis court will be).

**This photo shows the specific connections to Scenic Highway 1, Protected Trees and the proposed new parking lot as a result of the ripped out tennis courts.**

5. Please be aware that if any future work is completed in the State's right-of-way it will require an encroachment permit from Caltrans and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditions and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: <https://dot.ca.gov/caltrans-near-me/district-5/district-5-programs/d5-encroachment-permits>.

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

Sincerely,

*Christopher Bjornstad*

[Chris Bjornstad](#)

Associate Transportation Planner  
District 5 Development Review

*“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”*



## Response to Letter 14-2-s, Bud Get

1. This comment is about proposed project improvements that may encroach within the Caltrans State Route 1 right-of-way. The RDEIR, page 4-39, states, “encroachment permits from the County of Monterey and Caltrans will be required for all driveways, curbs, curb cuts, and any other roadway improvements that extend within or onto County or Caltrans rights-of-way.”

The tennis courts are located on school district property, not within the State Route 1 right-of-way. Work associated with the project that may encroach into the Caltrans and County rights-of-way include intersection improvements at Morse Drive and State Route 1. See Figure 4-10, Tennis Court Parking Lot – Conceptual Design. Required encroachment permits must be obtained prior to commence of the work encroaching on the rights-of-way. Obtaining encroachment permits prior to adoption of the Final EIR or approval of the proposed project is not required.

The high school campus and State Route 1 share a property boundary, which is identified in several figures within the RDEIR, including Figure 3-2, Existing Setting, Figure 4-1, Overall Site Plan, and Figure 7-1, Habitat Map. The trees are on the school district’s property. These figures also show the location of the proposed parking lots and trees related to State Route 1. Regarding visual impacts from State Route 1, see Section 5.0, Aesthetics, of the RDEIR.

Emergency access routes are presented in the RDEIR in Figure 4-1, Overall Site Plan, Figure 4-6, Post Development Overall Parking Exhibit and in Section 11.0, Transportation and Parking, under the impact 11-4 discussion (“Parking Capacity and Emergency Access”) starting on page 11-14. See also response to Letter 14-2-f.

The school district is not violating any terms or guidelines.

No changes to the RDEIR are necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Letter #14-2-t

Date: Wed, Oct 5, 2022 at 7:58 AM

Subject: RDEIR Feedback: ParkIT! Shuttle Program & Day-Use Reservation System

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>,

<[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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- Why aren't you including the ParkIT! Shuttle Program & Day-Use Reservation System CEQA in your cumulative projects? What would be the impact on traffic congestion, transportation as the route goes directly through the TMP and bus shuttle proposal as mitigation.
- <https://ceqanet.opr.ca.gov/2021100338>
- 
- Can you include Figure 15-1 to include this project?
- While you provide an index of distance, can you provide the exact distances for confirmation?
- This Figure shows CBTS is within walking distance of the CHS and proposed project. Have you had discussions with CBTS as a city of influence?

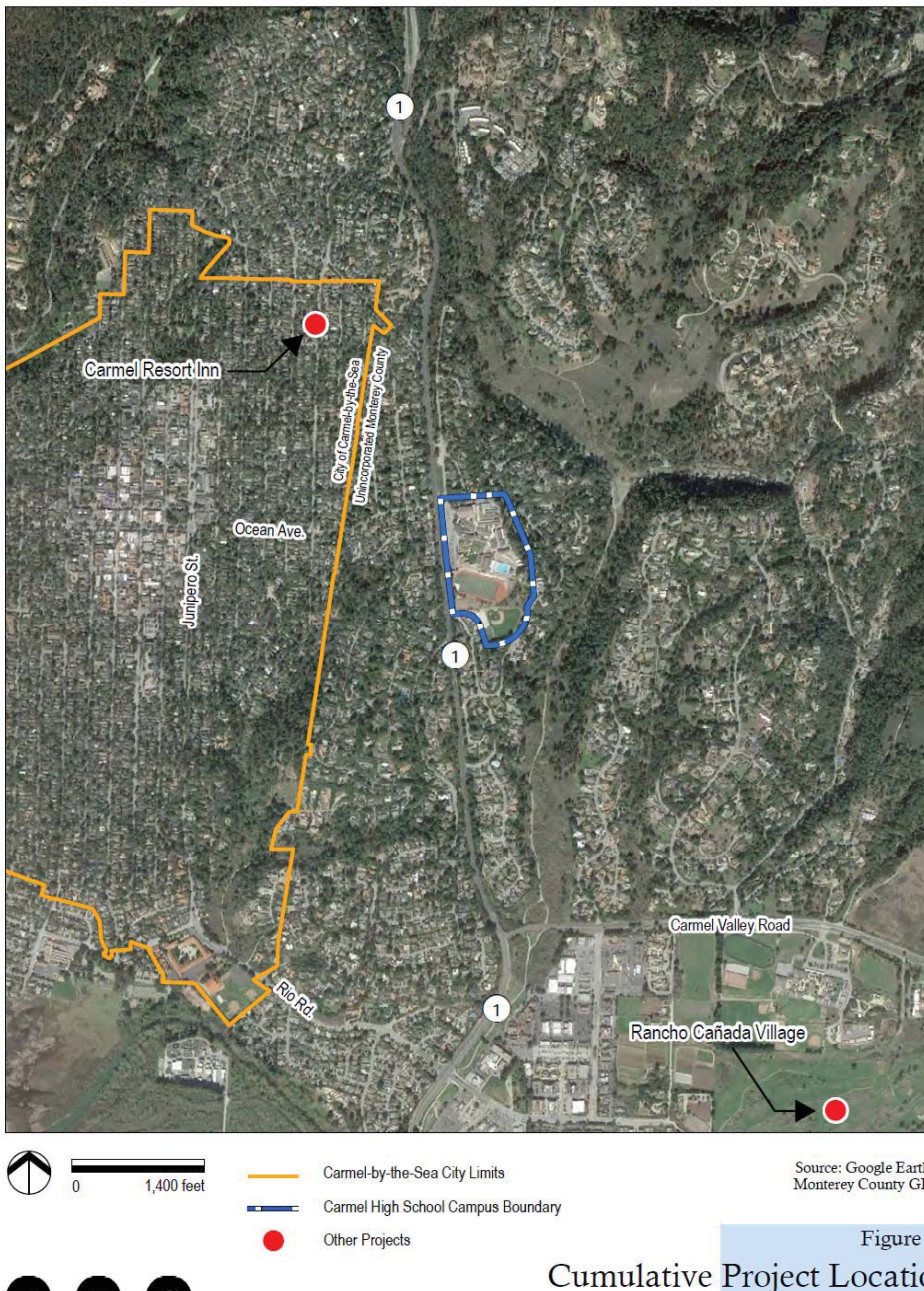


Figure 1

Cumulative Project Location

## Response to Letter 14-2-t, Bud Get

1. Regarding the ParkIT! Shuttle Program, see response to Letter 14-2-b, comment 2. Regarding CBTS, the City of Carmel-by-the-Sea received the Notice of Preparation, the original draft EIR, and the RDEIR. No comments were received from the City of Carmel-by-the-Sea.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:19 AM

Subject: RDEIR Feedback: Expansion of Stadium Improvements (Inclusion of all adjacent spaces including Baseball)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

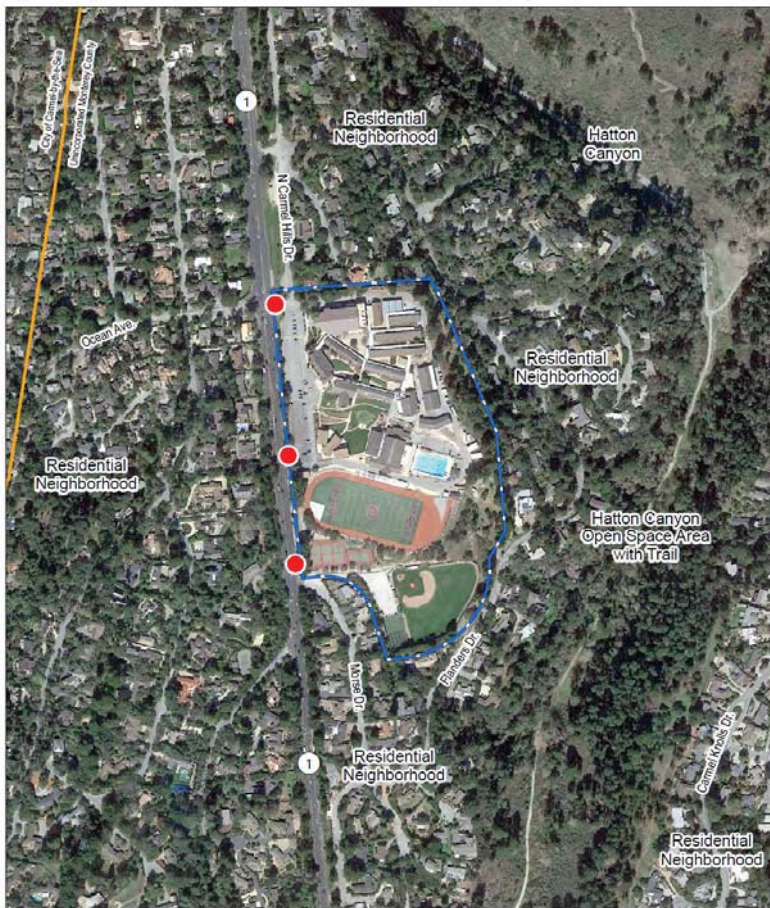
Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 CUSD has significantly increased the scope of the EIR so much more that the RDEIR is called now called Carmel High School Stadium Improvements Project with inclusion of the Swimming Pool and other broader areas of the athletic areas with consideration to traffic circulation, emergency access and parking.

- Why was this significant new scope added? You are indicating that all the pieces inter-related? If we assume that the swimming pool is related to "stadium improvements" the baseball fields should be part of the evaluation, solutions and considerations. Please respond:
- Can you provide a visual layout and specs of the campus in relationship to exact distances from swimming pool, stadium field, tennis courts and baseball field? Isn't the baseball field closer to the stadium than the swimming pool? Why are you not evaluating that alternative as solutions?
- Can you provide the legal boundary of the above areas in relationship to Scenic Highway 1, Residential and Morse?
- Figure 3-2: is existing setting but doesn't provide specific distances. Can you mark more accurately than just an index? Can you provide zoomed in aspects to understand relationship to Scenic Highway 1, Residential Streets (North Carmel Hills, etc)?
- Figure 3-6 is marked as on Campus Parking and Circulation but isn't that also the boundary lines? Can you please put them in context to Scenic Highway 1, Residential Streets in specific markings of distance?
- Can you provide distances distance from tennis courts to football/track/to baseball?
- The Baseball fields need more Athletic Improvements than anything. **Photo below shows dangerous back staircase to stadium field.** What is the plan for that? Will that be repaired? Why or why not is it included in the RDIER?
- Should the baseball field and students be moved to CMS vs. Tennis Courts? What are the repair costs/demolition cost for tennis courts vs. moving baseball field with no hardscape to CMS for more parking?
- How does that intersection of the gate entry from the baseball field work as an Emergency Access Route with the proposed project? It looks like only one Emergency Access route on Figure 3-6?
- The second photo provided shows the limited access to a potentially dangerous one lane fire lane?
- Will any of the trees be hurt in the photo below?







Source: Google Earth 2021,  
Monterey County GIS 2019

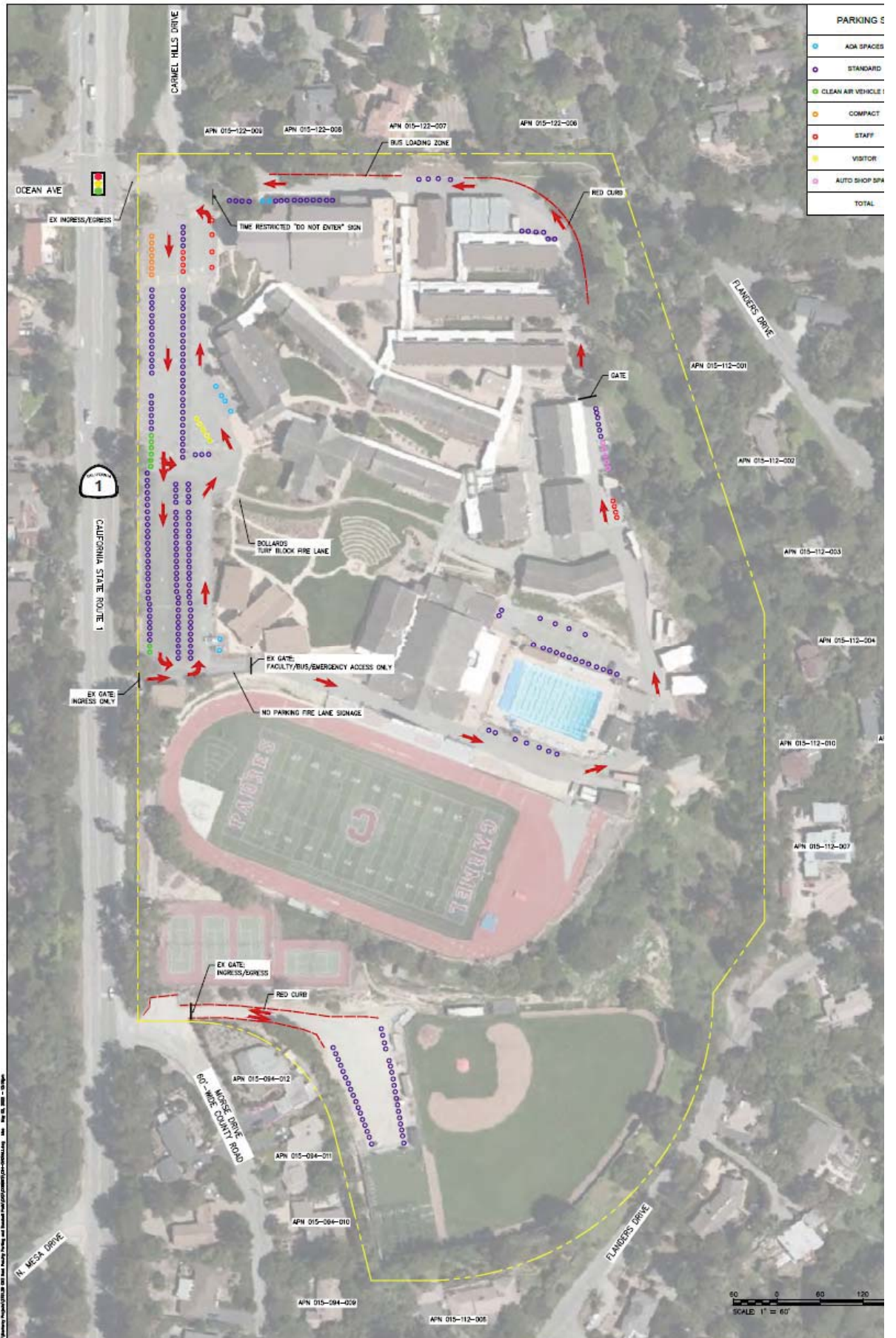
Figure 3-2

### Existing Setting





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## Response to Letter 14-2-u, Bud Get

1. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. Regarding the baseball field, see responses to Letters 14-1-g, 14-2-o. Regarding the project site location and setting, please see Subsection 3.2, and Figures 3-2 and 4-1 of the RDEIR, each of which includes a distance scale to give the reader a sense of distance of surrounding distance from surrounding uses; however, the commenter is not clear on what specific distances are being requested. For a discussion of existing trees, please refer to Section 7.0, Biological Resources. For information on emergency access routes, please refer to Figure 4-1, Overall Site Plan, Figure 4-6, Post Development Overall Parking Exhibit, and Section 11.0, Transportation and Parking (under “Parking Capacity and Emergency Access”) of the RDEIR. See also response to letter 14-2-f. Otherwise, the commenter does not raise any environmental issues in this email and therefore, no additional response is necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

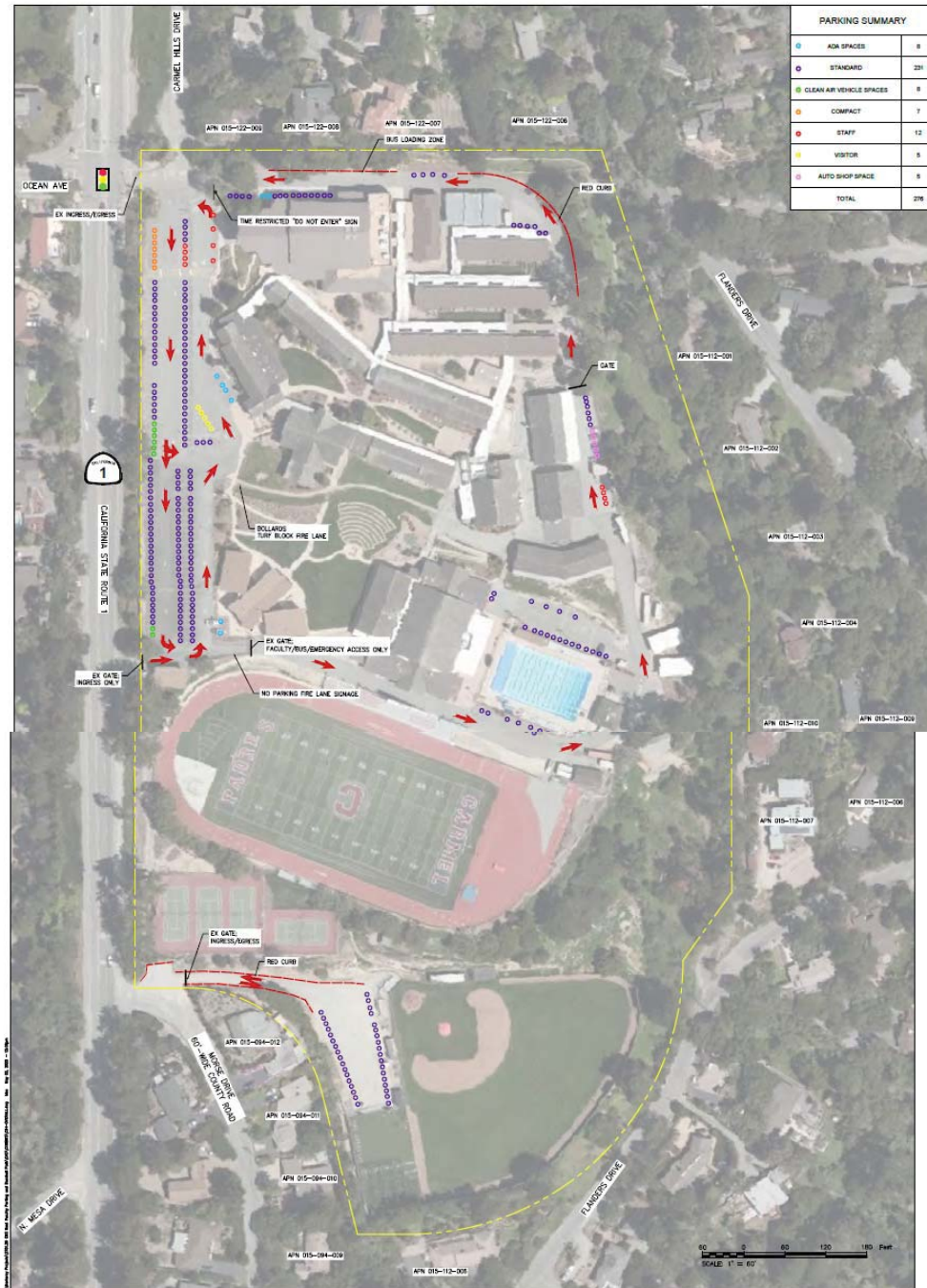
Date: Wed, Oct 5, 2022 at 8:44 AM

Subject: RDEIR Feedback: Violation of Monterey County General Plan and Project Plan

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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Source: Whitson Engineering 2/

**Figure 3**  
Existing On-Campus Parking Spaces and Circulation



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Page 122: You site the 2010 Monterey County General Plan several time and indicate:

*Even though the governing board of the school district has the authority to render city or county zoning ordinances and general plan requirements inapplicable to the project site and proposed project pursuant to California Government Code Section 53094, this RDEIR evaluates the proposed project's consistency with local regulations and policies for purposes of CEQA compliance.*

- However, you never directly correlate which of the below policies, zoning ordinances and general plan requirements you are at risk of violating with this project?
- Which ones will you be in violation of? Which ones are at risk? What will be your mitigation measures to not be at risk?
- Can you be specific with each aspect of the 4.2 Project characteristics of how you are meeting and/or in risk of the below policies, zoning ordinances, and general plan requirements? Can you be clear with itemed number how it adheres with the Monterey County General Plan? Where are you at risk of violation? Are there proposed Mitigated Measures?

1. Stadium field lights;
2. New storage building with a standing, viewing platform adjacent to the home bleachers;
3. A new parking area with 35 standard spaces east of the existing swimming pool;
4. A new parking lot with 76 standard spaces replacing the existing tennis courts south of the stadium
5. new 18-foot drive aisle connecting the existing main campus parking lot to the north, and a new pedestrian walkway.
6. New 20-foot driveway providing access to Morse Drive and the existing access to the baseball field parking to the east; and

- Can you include the GMP referenced **Figure 14** and drill down to the project Zone?
- Will you be encouraging Land owners to dedicate scenic easements? Where? Is it the baseball gate entrance and/or residents on Flanders? Do have to guess or will you ignore and hope we don't figure out how to ask the question properly?
- Isn't this new development right on the map that is cited on map as "Highly Sensitive"? Do you not have to adhere to the local zoning, policies and general plan requirements?
- PAGE 122: For each of the points you provided below (a-e), can you be specific what you will be violating and where?

**DETAILS from PAGE 122:**

GMP-3.3 **The Greater Monterey Peninsula Scenic Highway Corridors and Visual Sensitivity Map (Figure 14)** shall be used to designate visually "sensitive" and "highly sensitive" areas generally visible from designated Scenic Highways. The following policies shall apply to areas that have one of these designations:

a. All areas designated as "sensitive" or "highly sensitive" shall be interpreted within the meaning of this policy and are to be protected.

b. Landowners will be encouraged to dedicate scenic easements to an appropriate agency or non-profit organization over portions

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of their land shown as "sensitive" or "highly sensitive" on the Map.

c. Areas shown as "highly sensitive" on the Map should be preserved as open space to the maximum extent possible through scenic easements or, if necessary, fee acquisition.

d. New development should not be sited on those portions of property that have been mapped as "highly sensitive." Where exceptions are appropriate to maximize the goals, objectives, and policies of this plan, development shall be sited in a manner that minimizes visible effects of proposed structures and roads to the greatest extent possible, and shall utilize landscape screening and other techniques to achieve maximum protection of the visual resource.

e. New development to be located in areas mapped as "sensitive" or "highly sensitive" and which would be visible from a designated scenic route shall maintain the visual character of the area. In order to adequately mitigate the visual impacts of development in such areas, the following shall be required:

## Response to Letter 14-2-v, Bud Get

1. Regarding the school district legal right to be exempt from local zoning, see response to Letter 2b, comment 4, and response to Letter 1b, comment 16. Even though the school district is exempt from complying with the County policies, several Monterey County policies are included in the RDEIR to assist the school district with determining significant impacts. These RDEIR sections include Section 5.0, Aesthetics; Section 7.0, Biological Resources, Section 10.0, Noise; and Section 11.0, Transportation and Parking.

Figure 14 of the Greater Monterey Peninsula Area Plan is available online at <https://www.co.monterey.ca.us/home/showpublisheddocument/45898/636389941569630000>. The project site is located in an area designated as visually “sensitive” not “highly sensitive.” See also response to Letter 11b, comment 28.

Other comments in this email do not raise environmental issues and therefore, no further response is necessary. No changes to the RDEIR are necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 10:43 AM

Subject: RDEIR Feedback: CEQA Requirements and Overriding Considerations (Emergency Access Issues - Who will take responsibility)?

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)> \_\_\_\_\_

1 **On Page 337: Statement**

16.1 CEQA REQUIREMENTS

Pursuant to the CEQA Guidelines, a significant effect on the environment is defined as a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by a project, including effects on land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. (CEQA Guidelines, section 15382). A significant adverse unavoidable environmental impact is a significant adverse impact that cannot be reduced to a less-than-significant level through the implementation of mitigation measures. CEQA Guidelines section 15093 requires that a lead agency make findings of overriding considerations for unavoidable significant adverse environmental impacts before approving a project.

CEQA Guidelines section 15093(a) requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." CEQA Guidelines section 15093(b) states that when the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

2 **FACTS:**

- Given Impact 5-2. 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 is already "Significant and Unavoidable"



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AND

- We believe you have **vastly and incorrectly** underestimated Impact 11-4. An Increase in Event Attendance Could Result in Inadequate Parking During Limited Nighttime Events with Potential Emergency Access Issues (**this should be significant and unavoidable**)

4

**Our Questions:**

- How is the decision making agency defining, measuring or assessing:

- Economic
- Legal
- Social
- Technological
- or other benefits of the project against its unavoidable risks.

Shouldn't the process a Cost Benefit Analysis (CBA)? Should you be using this approach? Can you provide numbers that quantify how many people will see the lights, how far they will see the light and what are those impacts? It's just a picture right now. Where is the data?

Given one of the CEQA areas is around potential Emergency Access Issues, isn't this life/death/injury about people taking it seriously? What measure are you taking to ensure no injuries? Can you provide more details of the approach? Can you provide the specific criteria that you would review if you decided to override? Will CUSD and Board Members be taking responsibility if injury or death occurs and they did a Certification of Overriding Considerations (COC)?

Can you provide an explanation of what info or criteria (like a CBA) will inform the required Certification of Overriding Considerations (COC)?

**Can you drill down to the below required data that isn't included and required to inform any Overriding Considerations?**

- Any new data on who will be affected the lights, and how, other than the Page 127 map of visual impacts (this needs a drill down of quantification)
- Any explanation of whether and when the Certification of Overriding Considerations will involve a public discussion or release of data.
- In summary, this RDEIR provides nothing of any use to resolve these critical issues.

## Response to 14-2-w, Bud Get

1. This comment quotes CEQA Guidelines present in the RDEIR on page 16-1 regarding significant and unavoidable impacts. No environmental issue is raised and therefore, no response is necessary.
2. This comment restates Impact 5-2 regarding lighting impacts. No environmental issue is raised and therefore, no response is necessary.
3. This commenter provides an opinion that the increase in event attendance would result in a significant and unavoidable impact, but provides no data or evidence as support. No response is necessary.
4. This comment is a request to the school district to conduct a cost-benefit analysis. Neither CEQA nor the CEQA Guidelines require that an EIR includes studies comparing a proposed project's environmental costs with its benefits (*See San Francisco Ecology Ctr. v. City and County of San Francisco* (1975) 48 Cal. 3d 584, 595.). See also response to Letter 2b, comment 2. Similarly, economic and social effects are not treated as effects on the environment, and economic and social effects that are not related to physical impacts need not be evaluated in an EIR. (CEQA Guidelines, §§15131(a) & 15358(b).)

Regarding a statement of overriding considerations, while such a statement is a part of the CEQA process and would be required if the District's Governing Board decides to approval the project, the statement of overriding considerations is not a part of the EIR. As stated in the Notice of Completion and Availability issued on August 25, 2022, adoption and certification of this Final EIR and approval of the proposed project are scheduled to be brought before the district's board for consideration at a Special Meeting of the Board on Tuesday, November 29, 2022. More information regarding this meeting will be posted on the Board's website prior to this date in accordance with the Brown Act.

No changes to the RDEIR are required.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Letter #14-2-x

Date: Wed, Oct 5, 2022 at 2:21 PM

Subject: RDEIR Feedback: ADA Access (What is the definition, benchmark and current status)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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**On Page 71, you state that one of your objectives is: Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds.**

- Can you be more specific on ADA access? Are you currently not in compliance?
- Is it ADA access in regards to parking?
- Is it ADA access in regards to traffic circulation?
- On page 240 in the Facilities Master Plan, it looks like you are not in compliance with the restrooms? Is that the reference?
- Also, did the gymnasium receive new paint in Summer 2017? Should this be part of the athletic improvements in the expanded scope? Why or why not?
- What is the Snack Shack? Isn't that part of the stadium field? That was identified as poor condition?

#### **ADA Compliance**

Category [-]

- The restroom building does not have clearances that meet current ADA standards.

#### **Interior**

Overall Rating: Category [3]

- Interior finishes at Administration have not been updated since modernization except for minor touch-up paint.
- The flooring of the Cafeteria's dining room was replaced or resurfaced in 2004 and is in good condition.
- Rooms 24-25 were rebuilt in 2007, are insulated, and are in good condition.
- Rooms 26-28 were seismically upgraded when CPA was built.
- Rooms 41-43 finishes are in fair to poor condition and in need of an update.
- The Gymnasium received new floors and structural upgrades during 2002 modernization and new interior finishes and additional structural upgrades in 2016. It will receive new paint Summer 2017. The Snack Shack interiors, however, are in poor condition.
- Room 40 (auto shop/wood/robotics/industrial arts) interior finishes show extensive wear and tear. Access/use of the loft is desired.
- Administration building has glue up tiles, fluorescent lighting, VCT flooring throughout with carpet in offices and conference rooms. Finishes are worn and in poor condition.
- Room 6-8 wing has acoustical spray ceiling, VCT floor, tackable walls, and a teaching wall.

## Response to Letter 14-2-x, Bud Get

1. Regarding this objective, see response to Letter 14-2-g, comment 7. The questions about gymnasium, restrooms, and the “Snack Snack” are not associated with the proposed project. Therefore, no further response is necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 10:53 AM

Subject: Re: RDEIR Feedback: Violation of Monterey County General Plan and Project Plan

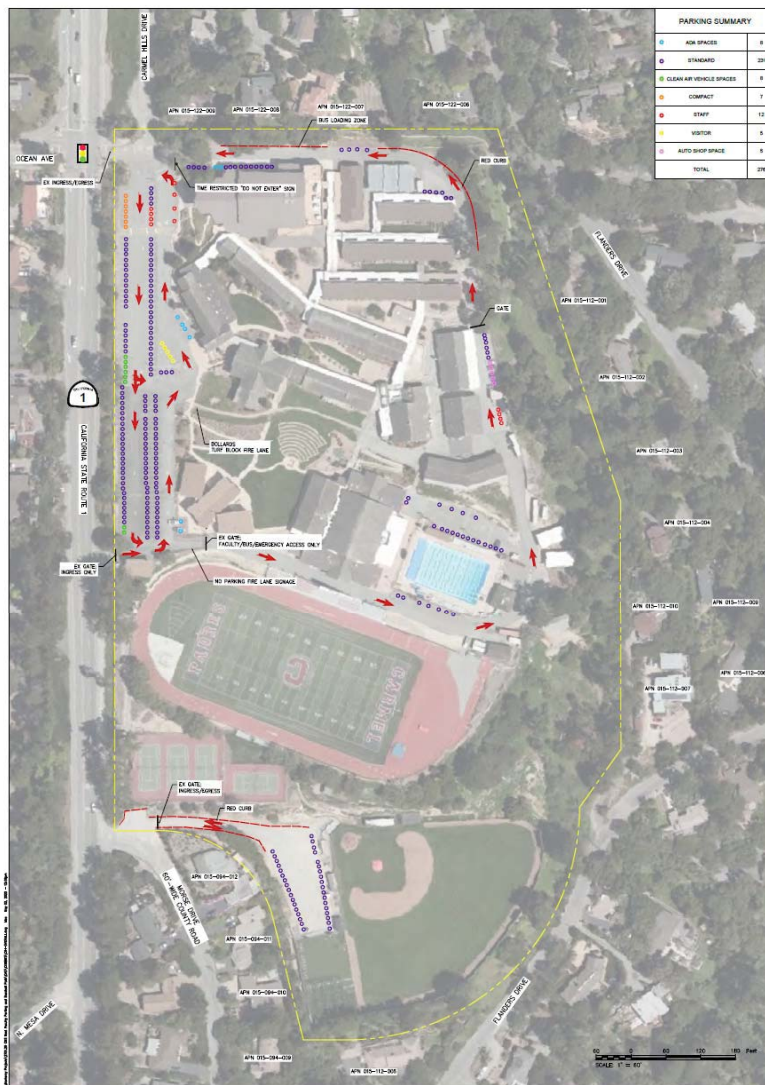
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[christopher.bjornstad@dot.ca.gov](mailto:christopher.bjornstad@dot.ca.gov)>, <[info-d5@dot.ca.gov](mailto:info-d5@dot.ca.gov)>

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**Additional Questions:**

- Who are the other agencies that you would need approval / permission / to violate the Scenic Highway program?
- Given the e-mail is centered around the Monterey County General Plan, who are the local contacts, agencies, groups and organizations you plan to involve to ensure you meet the zoning/ordinances/policies for the Monterey County General Plan? What permission do you need from them and what are the required forms and process?



Source: Whitson Engineering

Figure  
Existing On-Campus Parki  
Spaces and Circulati



Page 122: You cite the 2010 Monterey County General Plan several times and indicate:

*Even though the governing board of the school district has the authority to render city or county zoning ordinances and general plan requirements inapplicable to the project site and proposed project pursuant to California Government Code Section 53094, this RDEIR evaluates the proposed project's consistency with local regulations and policies for purposes of CEQA compliance.*

- However, you never directly correlate which of the below policies, zoning ordinances and general plan requirements you are at risk of violating with this project?
  - Which ones will you be in violation of? Which ones are at risk? What will be your mitigation measures to not be at risk?
  - Can you be specific with each aspect of the 4.2 Project characteristics of how you are meeting and/or in risk of the below policies, zoning ordinances, and general plan requirements? Can you be clear with item number how it adheres with the Monterey County General Plan? Where are you at risk of violation? Are there proposed Mitigated Measures?
1. Stadium field lights;
  2. New storage building with a standing, viewing platform adjacent to the home bleachers;
  3. A new parking area with 35 standard spaces east of the existing swimming pool;
  4. A new parking lot with 76 standard spaces replacing the existing tennis courts south of the stadium
  5. new 18-foot drive aisle connecting the existing main campus parking lot to the north, and a new pedestrian walkway.
  6. New 20-foot driveway providing access to Morse Drive and the existing access to the baseball field parking to the east; and
- Can you include the GMP referenced **Figure 14** and drill down to the project Zone?
  - Will you be encouraging Land owners to dedicate scenic easements? Where? Is it the baseball gate entrance and/or residents on Flanders? Do you have to guess or will you ignore and hope we don't figure out how to ask the question properly?
  - Isn't this new development right on the map that is cited on map as "Highly Sensitive"? Do you not have to adhere to the local zoning, policies and general plan requirements?
  - PAGE 122: For each of the points you provided below (a-e), can you be specific what you will be violating and where?

**DETAILS from PAGE 122:**

GMP-3.3 **The Greater Monterey Peninsula Scenic Highway Corridors and Visual Sensitivity Map (Figure 14)** shall be used to designate visually "sensitive" and "highly sensitive" areas generally visible from designated Scenic Highways. The following policies shall apply to areas that have one of these designations:

- a. All areas designated as "sensitive" or "highly sensitive" shall be interpreted within the meaning of this policy and are to be protected.
- b. Landowners will be encouraged to dedicate scenic easements to an appropriate agency or non-profit organization over portions



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of their land shown as "sensitive" or "highly sensitive" on the Map.

c. Areas shown as "highly sensitive" on the Map should be preserved as open space to the maximum extent possible through scenic easements or, if necessary, fee acquisition.

d. New development should not be sited on those portions of property that have been mapped as "highly sensitive." Where exceptions are appropriate to maximize the goals, objectives, and policies of this plan, development shall be sited in a manner that minimizes visible effects of proposed structures and roads to the greatest extent possible, and shall utilize landscape screening and other techniques to achieve maximum protection of the visual resource.

e. New development to be located in areas mapped as "sensitive" or "highly sensitive" and which would be visible from a designated scenic route shall maintain the visual character of the area. In order to adequately mitigate the visual impacts of development in such areas, the following shall be required:

## Response to Letter 14-2-y, Bud Get

1. Caltrans is the only agency that issues encroachment permits for improvements at the State Route 1/Morse Drive intersection. Please refer to response to Letter 14-2-s, comment 1, above. As addressed in the RDEIR, the proposed project does not “violate the Scenic Highway program.” See page 5-14 of Section 5.0, Aesthetics (under “Issues or Potential Impacts not Discussed Further”) of the RDEIR for additional discussion. The NOP, original draft EIR, and the RDEIR were provided to the County of Monterey for comment. The school district did not receive any comments from the County. Please also see response to Letter 2b, comment 4, and response to Letter 11b, comment 16. As discussed in Subsection 4.3 of the RDEIR, the school district is the lead agency for the proposed project, and responsible agencies may include the Division of the State Architect (DSA), the County, Caltrans, and/or Monterey Bay Air Resources District with respect to the jurisdictional scope specified therein.
2. This comment is regarding Monterey County policies and the school district’s legal authority to exempt the district from the policies. See responses to Letter 2b, comment 4; Letter 11b, comment 16, Letter 11b, comment 28, and Letter 14-2-v, comment 1.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 12:41 PM

Subject: RDEIR Feedback: Traffic Circulation: Limited Scope and Not Enough Data (Photo of Highway 1 Intersection)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>,

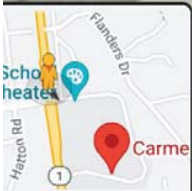
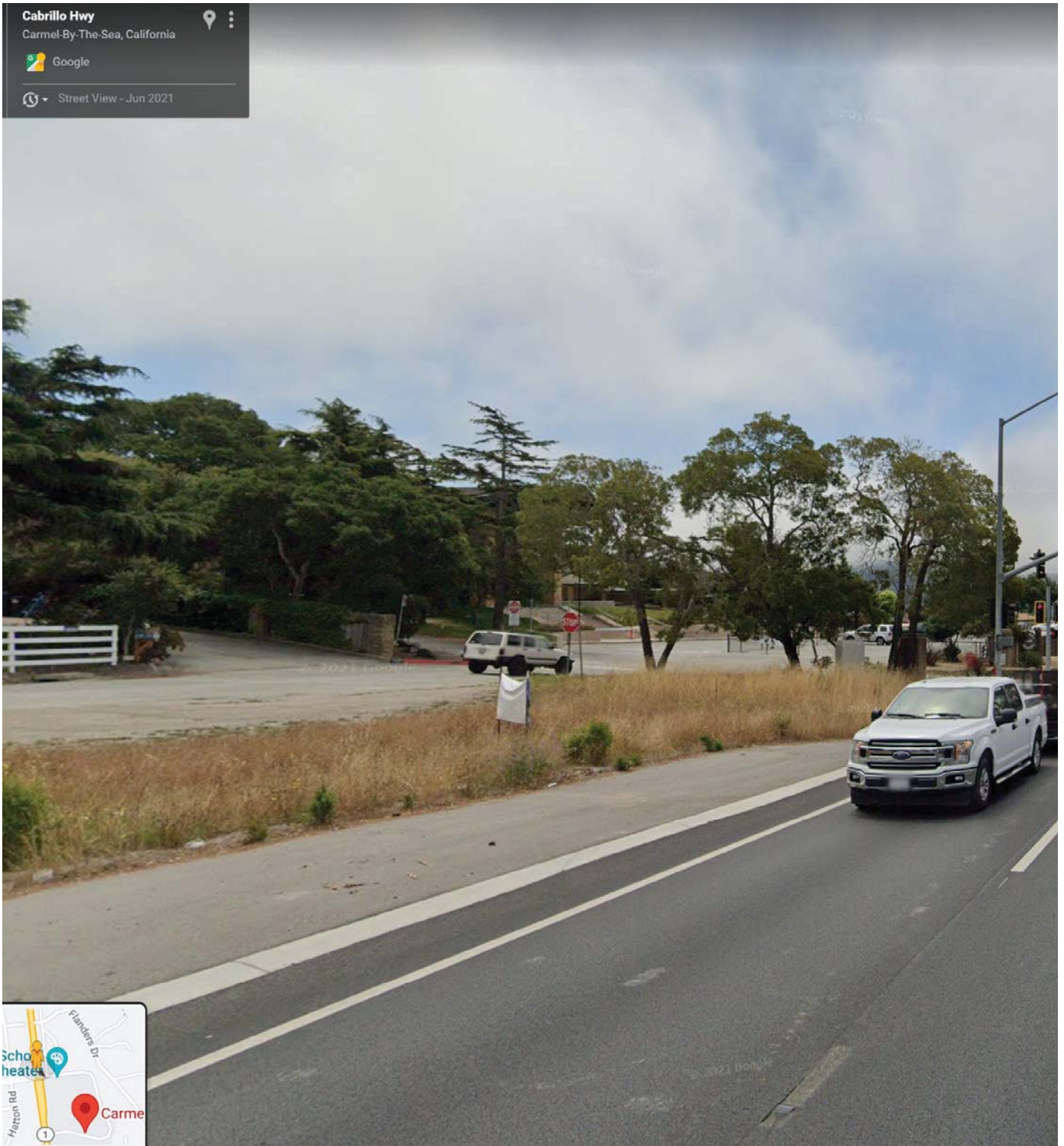
<[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 **On Page 71, you state that one of your objectives is: Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds**

- Why are you limiting transparency, benchmarking and language around the current state as part of the Environmental Setting? We only see one reference to "circulation" in Figure 3-6. Can you provide a more in-depth description of the conditions? Has a previous traffic circulation study been conducted? We see no reference or data? How do we evaluate without information?
- Have you considered on-campus traffic circulation is also impacted by the limitations of the external surroundings?
- **This photo indicates CHS's limitation to improve traffic circulation is hindered by the lack of space to expand and improve circulation.**
- **This photo indicates high traffic limiting ingress and egress to CHS Campus - the campus can't expand beyond 22 acres.**
- **This photo shows North Carmel Hills (left with white car stopped at signal): that is the only road that relieves traffic and it's residential. Where else have you identified ingres and egress opportunities?**
- What tools and metrics have you used in the past to measure, improve or understand traffic circulation?
- Do you have data, insights, comments or perspective on:
  - What is the average carpool vehicles? Do you encourage or reward among the students and/or staff?
  - Do you have established multiple loading bays and staffing each bay with safety patrol to assist loading so you can greatly reduce vehicle loading and unloading time?
  - Do you have metrics on the act of loading and unloading students how much time it should take per vehicle?
  - What is the complete process of a vehicle entering, loading and unloading passengers, and then exiting can be completed in less how much time?
  - Should you be limiting options for drivers to reduce circumventions that may lead to crashes?
  - Have you identified a simple decision tree to assist administrators in identifying the nature of a traffic concern and to provide recommendations for appropriate solutions?
  - Do you have schematics for the optimal layout for loading and unloading students, with explanations of the recommended operating procedures and video clips of actual operations?

- 2
- Have you worked with Public Works or other agencies to understand limitations based on your location?
  - We strongly encourage CUSD to properly assess CMS as a long-term viable solution. The limitation of traffic circulation, fire and emergency vehicle access and parking issues can easily be resolved in comparing the growth need from a 22 acre campus vs. 60+ acre campus.

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con't.



## Response to Letter 14-2-z, Bud Get

1. Regarding the project objective to improve on-campus traffic circulation, see response to Letter 14-2-g, comment 7. The questions in this comment email are regarding existing operations at the high school campus and are not regarding the proposed project. For a discussion of baseline conditions, please refer to Section 3.0, Environmental Setting, in general, and Subsection 11.1, Environmental Setting, specific to transportation and parking. Therefore, no response is necessary.
2. Regarding working with Public Works, the school district has been consulting with the Monterey County Public Works Department regarding implementation of the Traffic Mitigation Plan, associated with limited parking on the adjacent neighborhood.

Regarding Carmel Middle School, an alternative to construct a lighted stadium at the middle school was evaluated in Section 18.0, Alternatives, of the RDEIR as Alternative 4.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 3:59 PM  
Subject: RDEIR: Appendix J: VMT Calculations should be done with all athletes and in combination of variations  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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**On Page 7 You State:**

*VMT estimates are calculated based on land use travel patterns during an average weekday. Unlike these typical uses, however, there is a significant variance in day-to-day project generated trips for high school football games since the stadium would host football games only once per week during football season (see paragraph below for additional detail). No vehicular traffic would be generated during non-game days. Calculating only the VMT generated during Friday game days would not accurately represent average weekday VMT. Instead, it is necessary to divide the total number of trips generated during a game week (i.e. the trips generated during a Friday football game) by the five weekdays to provide an average weekly trip estimate.*

**Questions**

- Why are you only calculating VMT generated during Friday game days?
- You are proposing to move more than 130 soccer kids to CHS for games/practices for use of stadium lights? Why are they not part of the VMT in Appendix J?
- Why aren't the tennis students in Appendix J for VMT? You are proposing to rip out the tennis courts, so why isn't it cumulative so all athletes?
- Shouldn't all games/meets/practices be part of Appendix J for an accurate impact to the Environmental Report?



## Response to Letter 14-3-a, Bud Get

1. This comment is regarding the vehicle miles traveled (VMT) analysis, now a requirement of CEQA. The VMT analysis is presented in its entirety in Appendix J of the RDEIR and also presented in Section 11.0, Transportation and Parking. The VMT analysis was conducted by a professional transportation firm using the CEQA Guidelines, the *Technical Advisory On Evaluating Transportation Impacts in CEQA* ([https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)), and standard professional transportation engineering practices.

The proposed project would not result in typical VMT such as a residential subdivision, retail development, or a new school would. The proposed project would result in additional VMT for some games as described and evaluated in Section 11.0. The methodology for the analysis is presented on page 11-8, which utilized the “Worst-case, Maximum Spectator Attendance Scenario – Homecoming/Rivalry Football Games” in order to obtain an average daily VMT. Using other, less-attended games into the methodology would have resulted in fewer VMT.

Regarding “moving more than 130 soccer kids to the high school for games/practices for use of stadium lights,” the commenter does not indicate what 130 soccer kids are being moved to the high school. It could be that the commenter is referring to the Carmel High School JV girls and boys soccer teams that currently practice at Carmel Middle School. With implementation of the project, they will be able to practice at the high school. Therefore, VMT associated with the teams traveling to the middle school will be eliminated. For further discussion, please refer to Section 11.0, Transportation and Parking, of the RDEIR (page 11-8).

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 3:56 PM

Subject: RDEIR: Have Responsible Agencies Been Updated and Fully Informed of changes in Project Characteristics and Objectives (CALTRANS)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[info-d5@dot.ca.gov](mailto:info-d5@dot.ca.gov)>, <[christopher.bjornstad@dot.ca.gov](mailto:christopher.bjornstad@dot.ca.gov)>

1 | **Given you significantly changed the Project Objectives AND the Project Characteristics AND won't acknowledge previous comments AND have re-started the Scoping/NOP how are you required to update the agencies?**

**QUESTIONS:**

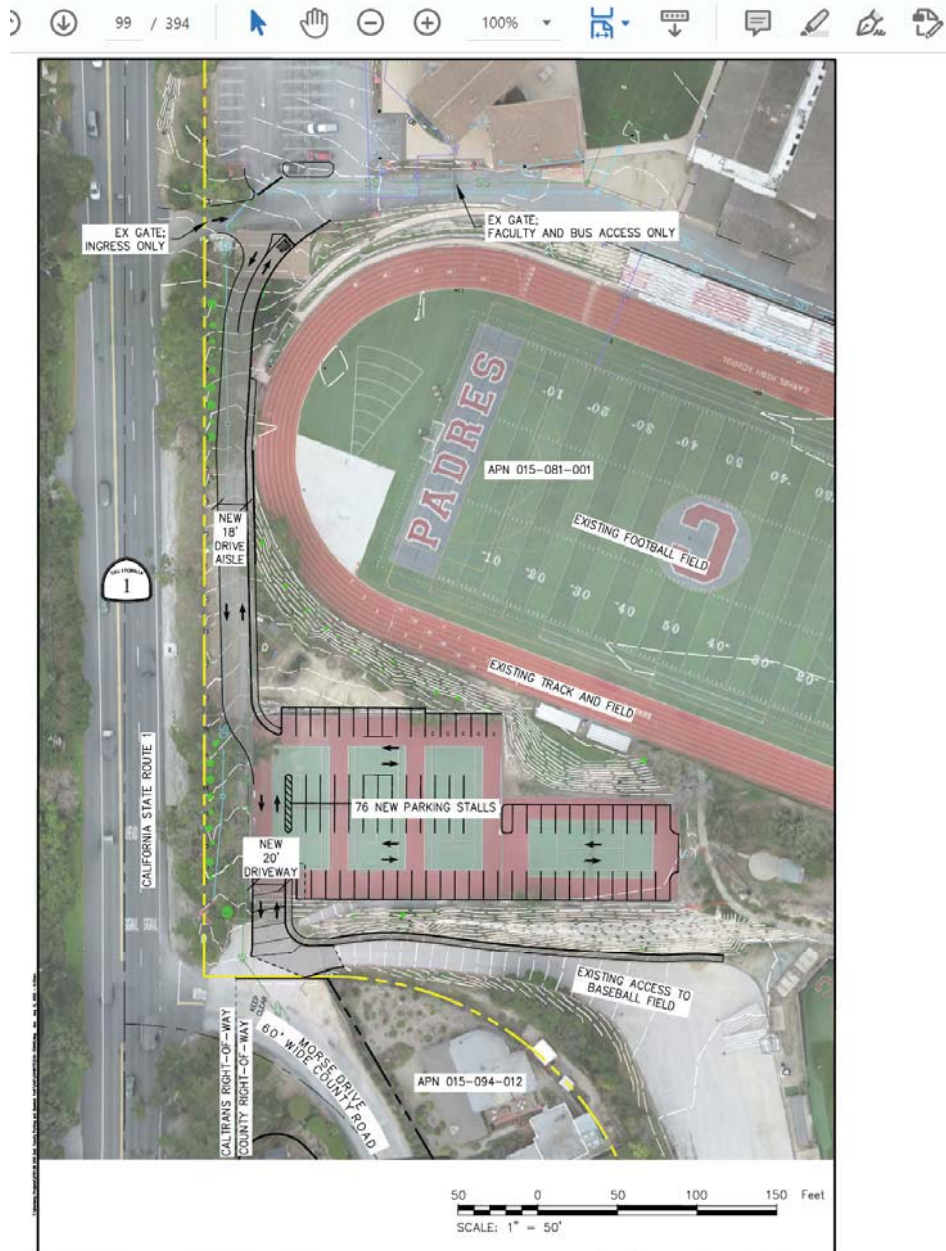
- **Did you submit new project plans and notify Caltrans?**
- **Given the significant new scope, shouldn't their input be garnered at this stage?**
- **Wouldn't there be benefit in going back to the Scoping Session, engage community feedback and properly go through the Notice of Preparation? Why skip steps and upset the community? Is that great leadership and promise of bringing people together?**
- **Below is the original Caltrans's feedback? What changes now with the new scope you've introduced into Project Characteristics?**
- **How do you properly inform the agencies of what has been impacted?**

2 | **1) Caltrans, District 5 (dated May 26, 2021 in NOP and referenced in DEIR but new scope not part of their assessment in RDEIR Update)**

- Noted 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.
- CALTRANS: For actions that were approved by the applicant or another public agency with a CEQA Exemption, the applicant must provide a copy of the Notice of Exemption (NOE) that was filed with the appropriate county clerk and the State Clearinghouse. It is not necessary for Caltrans staff to prepare a separate CE and/or NOE. However, if an NOE has not been filed by the lead agency, Caltrans should request that the applicant file an NOE with the State Clearinghouse pursuant to CEQA Guidelines 15062(c)(4)

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- You have indicated on PAGE 99 that your Parking Lot (WITH NO SPECS) butts up on Caltrans Right of Way. YES they are NOT aware as this was not part of the Notice of Exemption. Please start the Scoping Session and Notice of Preparation OVER AGAIN!



Source: Whitson Engineers 2022

Figure 4-10  
Tennis Court Parking Lot - Conceptual Design

## Response to Letter 14-3-b, Bud Get

1. Regarding scoping and Caltrans notification, refer to the response to Letter 2c, comment 3; and Letter 14-2-j. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.
2. Regarding Caltrans request for a Vehicle Miles Traveled (VMT) assessment, see Section 11.0, Transportation and Parking, and Appendix J of the RDEIR.
3. Regarding Caltrans and a Notice of Exemption, this comment is not related to the proposed project or the RDEIR, as the proposed project is not exempt from CEQA.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 2:27 PM

Subject: RDEIR Feedback: Alternative Locations for NEW Parking Lots

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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The RDEIR is unclear on what CUSD is trying to achieve, what is the baseline and how do they know when they've achieved it when it comes to new parking lots.

## QUESTIONS

- Has an exhaustive search been done for where parking lots could be located outside of ripping up tennis courts?
- What alternative locations were considered? What was the criteria for location selection?
- If you are trying to improve traffic circulation, have considered the three areas between the science building and main entrance as extensions of the main campus parking lot.
- What are additional open spaces that don't require tear down / demolition costs for existing facilities like tennis courts.
- Have you considered permanent off-site locations for parking at CMS and bus students up to CHS?
- There was no information provided in the RDEIR or in the Facilities Master Plan that assessed - why do you need more parking?



## Response to Letter 14-3-c, Bud Get

1. This comment is about alternatives to the new parking lot where the tennis courts are currently located. The proposed project includes two new parking areas with a total of 111 new spaces, which are discussed in detail in Section 4.0, Project Description, and evaluated throughout the RDEIR for their environmental impacts. The new parking areas were added to the project description because of public comments received during the public review period for the original draft EIR. Please see responses to Letter 2b, comment 4, and Letter 11b, comment 16. The new parking lot on the tennis courts is part of the 2019 facilities master plan, and the new parking area east of the swim facility was identified by staff and their civil engineering consultants in response to the public's request for more parking. See Section 4.0, Project Description, under "New Parking Lots," and Section 11.0, Transportation and Parking, under "Parking Capacity and Emergency Access" for further discussion.

The commenter is recommending parking between the science building and the main entrance, which is currently an outdoor amphitheater, lawn areas, and walking paths. The school district has not considered this space for parking, and does not think conversion of this space would be appropriate for a parking lot. Moreover, CEQA does not require that an agency consider alternatives to a component of a project, and should instead focus on alternatives to the project as a whole (*Calif. Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 993.)

Parking at Carmel Middle School for highly-attended events at the high school are part of the Traffic Management Plan, presented as Mitigation Measure 11-4. Parking students during the day at Carmel Middle School and bussing them to the high school is not necessary and is not part of the proposed project.

With respect to project objectives, please refer to Subsection 4.1 of the RDEIR. With respect to baseline conditions, please refer to Section 3.0, Environmental Setting, and the Environmental Setting subsection under each environmental topic category section in the RDEIR.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 2:30 PM

Subject: RESEND: RDEIR Feedback: Traffic Circulation: Limited Scope and Not Enough Data (Photo of Highway 1 Intersection)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Resending for confirmation of receipt.  
Resending so photo size was not an issue.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 12:40 PM

Subject: RDEIR Feedback: Traffic Circulation: Limited Scope and Not Enough Data (Photo of Highway 1 Intersection)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

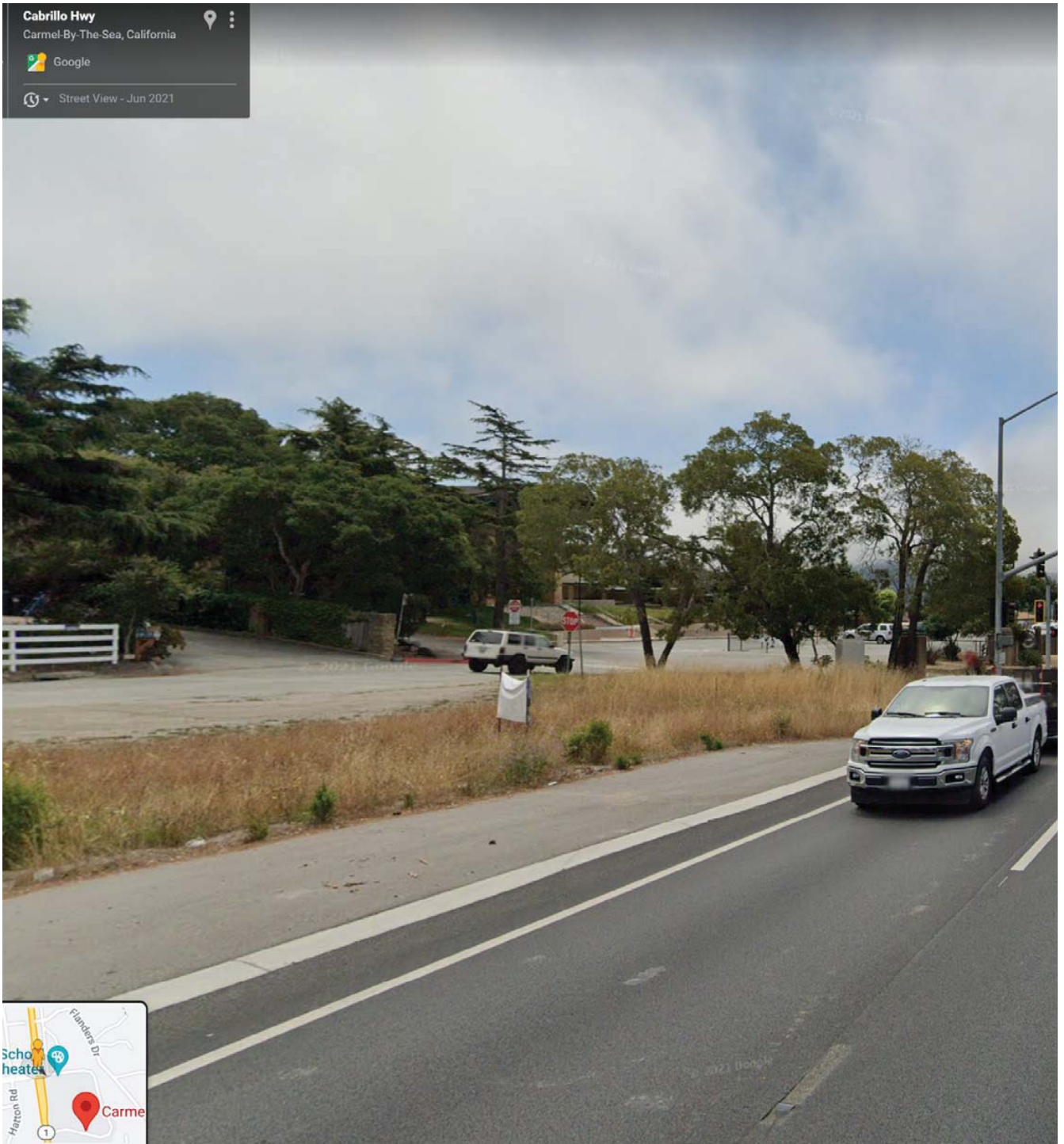
Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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**On Page 71, you state that one of your objectives is: Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds**

- Why are you limiting transparency, benchmarking and language around the current state as part of the Environmental Setting? We only see one reference to "circulation" in Figure 3-6. Can you provide a more in-depth description of the conditions? Has a previous traffic circulation study been conducted? We see no reference or data? How do we evaluate without information?
- Have you considered on-campus traffic circulation is also impacted by the limitations of the external surroundings?
- **This photo indicates CHS's limitation to improve traffic circulation is hindered by the lack of space to expand and improve circulation.**
- **This photo indicates high traffic limiting ingress and egress to CHS Campus - the campus can't expand beyond 22 acres.**
- **This photo shows North Carmel Hills (left with white car stopped at signal): that is the only road that relieves traffic and it's residential. Where else have you identified ingres and egress opportunities?**
- What tools and metrics have you used in the past to measure, improve or understand traffic circulation?
- Do you have data, insights, comments or perspective on:
  - What is the average carpool vehicles? Do you encourage or reward among the students and/or staff?
  - Do you have established multiple loading bays and staffing each bay with safety patrol to assist loading so you can greatly reduce vehicle loading and unloading time?
  - Do you have metrics on the act of loading and unloading students how much time it should take per vehicle?
  - What is the complete process of a vehicle entering, loading and unloading passengers, and then exiting can be completed in less how much time?
  - Should you be limiting options for drivers to reduce circumventions that may lead to crashes?
  - Have you identified a simple decision tree to assist administrators in identifying the nature of a traffic concern and to provide recommendations for appropriate solutions?
  - Do you have schematics for the optimal layout for loading and unloading students, with explanations of the recommended operating procedures and video clips of actual operations?
- Have you worked with Public Works or other agencies to understand limitations based on your location?
- We strongly encourage CUSD to properly assess CMS as a long-term viable solution. The limitation of traffic circulation, fire and emergency vehicle access and parking issues can easily be resolved in comparing the growth need from a 22 acre campus vs. 60+ acre campus.

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con't.



## Response to Letter 14-3-d, Bud Get

1. This comment is identical to Letter 14-2-z submitted by the same commenter. See response to Letter 14-2-z.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 4:54 PM

Subject: RDEIR: Another view of Baseball lane (How does that align with Figure 3-6)?

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[christopher.bjornstad@dot.ca.gov](mailto:christopher.bjornstad@dot.ca.gov)>, <[info-d5@dot.ca.gov](mailto:info-d5@dot.ca.gov)>

1 On Page: 67 you provide Figure 3-6 as the Existing On-Campus Parking Spaces and Circulation outline (Close-up Below).

**Questions:**

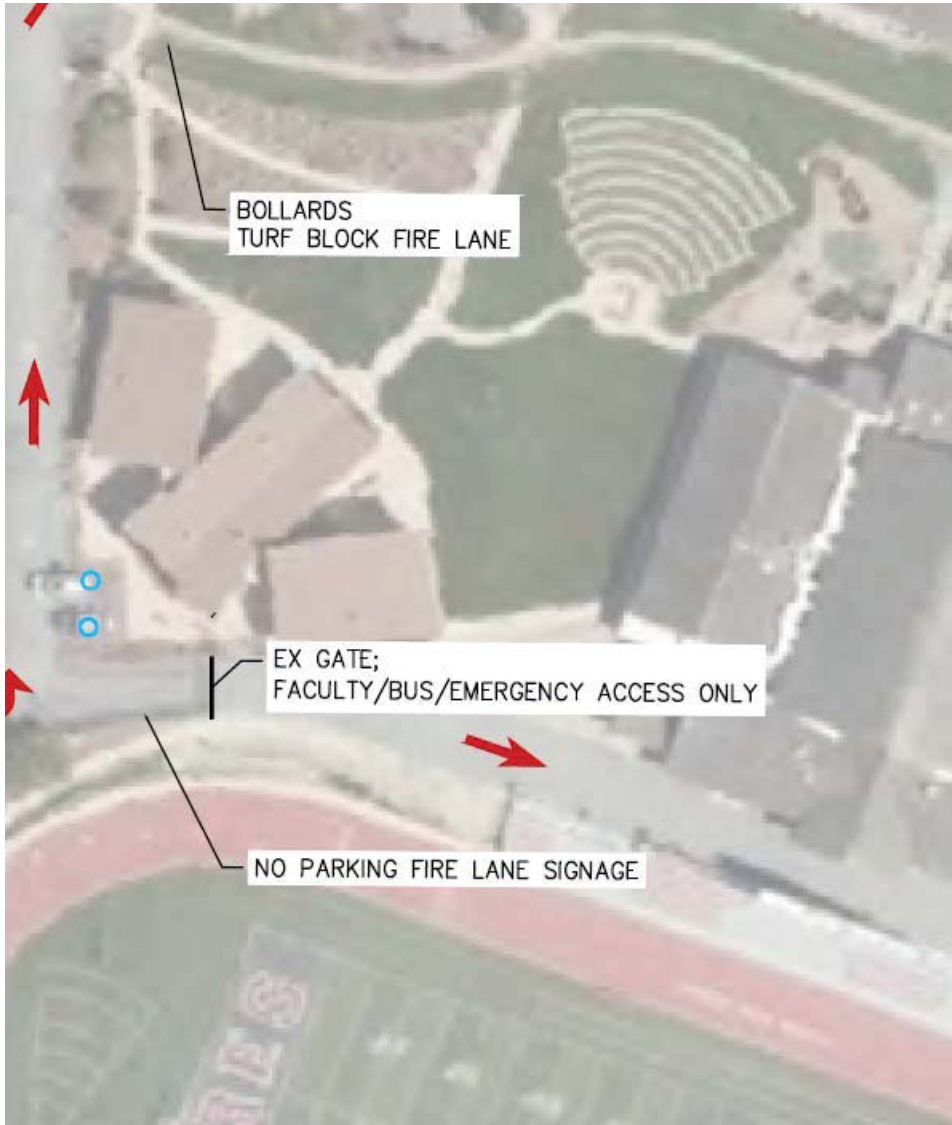
- A real photo is provided right below Figure 3-6 that correlates to where your two red arrows are shown.
- The way your two arrows are stacked on top of each other, it implies that two cars can pass each other? Is that the case? Can you provide specifics on the width of the lane?
- We don't see Firelane marked on Figure 3-6 - is that accurate to the baseball field entrance gate??
- What does "Red Curb" mean? Where does that term come from? What is the definition of the terminology? Is this an official term from another agency?
- Why does the photo we provide show a Fire Lane and your Figure 3-6 not more it accordingly?
- You are specific in Figure 3-6 that there two other fire lanes, so why aren't you including the baseball gate entrance as part of the accurate fire lane marking?
- You identify what is the parking but what do the red-lines mean?
- What is that red-line in-front of the Tennis Court Mean?
- How do these red overlap with page 73 where you have Figure 4-1?
- Can you provide how Figure 4-1 and Figure 3-6 overall? Shouldn't you have a combination visual of proposed plan with markings of residents, fire lanes, etc?
- How does that 4 foot side walk look with specs? What is the material and how does it align with the "red curb"? Does the red curb go away?
- It's very unclear of the intersection of the proposed 18 foot aisle (next to new parking space) and the intersection of the baseball gate (ingress/egress) - can you show what do two cars look like when they both arrive at the intersection? Should you be configuring one-ways?
- How does traffic circulation and flow work if both the ingress/egress on the tennis court parking lot is backed up at the same time with the baseball entrance? Wouldn't that impact Morse and Scenic Highway 1?
- Copying Caltrans to have them examine implications to the Scenic Highway Corridor Program. Have they approved and provided feedback?



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## Response to Letter 14-3-e, Bud Get

1. This comment is regarding Figure 3-6, Existing On-Campus Parking Spaces and Circulation, which is on page 3-23 of the RDEIR (page 67 of the PDF). This figure presents *existing* on-campus parking spaces and circulation. The red arrows indicate existing ingress and egress from Morse Drive to the baseball field. As indicated on Figure 3-6, the red lines show the location of existing red curbs. No changes to these existing red curbs are proposed. The photo provided in this comment is a photograph of this existing road. No changes to this internal road are proposed or necessary. Photos of the existing pedestrian pathways can be found at Figure 3-4 of the RDEIR. A description of the proposed pedestrian path improvements is found starting on pages 3-16 and 4-21. Figure 4-10 shows the proposed locations of the pedestrian path, and Figure 4-9 shows closer detail of the proposed pedestrian path located along the existing red curb. Black arrows on Figure 4-10 indicate paths of vehicle travel at the new 20-foot driveway, along the new 18-foot drive aisle, and within the proposed new tennis court parking lot.

To highlight both the existing and proposed red curbing on and around the proposed tennis court parking lot in order to provide adequate access for emergency access vehicles, a revision has been made to Figure 4-10 showing all red curbing. See Section 3.0, Changes to the Revised Draft EIR, of this final EIR for this revised figure.

The commenter also asks about Figure 4-1, Overall Site Plan. This figure presents the proposed changes.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 3:56 PM

Subject: RDEIR: Have Responsible Agencies Been Updated and Fully Informed of changes in Project Characteristics and Objectives (CALTRANS)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[info-d5@dot.ca.gov](mailto:info-d5@dot.ca.gov)>, <[christopher.bjornstad@dot.ca.gov](mailto:christopher.bjornstad@dot.ca.gov)>

1 | **Given you significantly changed the Project Objectives AND the Project Characteristics AND won't acknowledge previous comments AND have re-started the Scoping/NOP how are you required to update the agencies?**

**QUESTIONS:**

- **Did you submit new project plans and notify Caltrans?**
- **Given the significant new scope, shouldn't their input be garnered at this stage?**
- **Wouldn't there be benefit in going back to the Scoping Session, engage community feedback and properly go through the Notice of Preparation? Why skip steps and upset the community? Is that great leadership and promise of bringing people together?**
- **Below is the original Caltran's feedback? What changes now with the new scope you've introduced into Project Characteristics?**
- **How you do properly inform the agencies of what has been impacted?**

**1) Caltrans, District 5 (dated May 26, 2021 in NOP and referenced in DEIR but new scope not part of their assessment in RDEIR Update)**

- Noted 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.
- CALTRANS: For actions that were approved by the applicant or another public agency with a CEQA Exemption, the applicant must provide a copy of the Notice of Exemption (NOE) that was filed with the appropriate county clerk and the State Clearinghouse. It is not necessary for Caltrans staff to prepare a separate CE and/or NOE. However, if an NOE has not been filed by the lead agency, Caltrans should request that the applicant file an NOE with the State Clearinghouse pursuant to CEQA Guidelines 15062(c)(4)
- You have indicated on PAGE 99 that your Parking Lot (WITH NO SPECS) butts up on Caltrans Right of Way. YES they are NOT aware as this was not part of the Notice of Exemption. Please start the Scoping Session and Notice of Preparation OVER AGAIN!

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Source: Whitson Engineers 2022

Figure 4-10  
Tennis Court Parking Lot - Conceptual Design

## Response to Letter 14-3-f, Bud Get

1. See response to Letter 14-3-b.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 2:21 PM

Subject: RDEIR Feedback: ADA Access (What is the definition, benchmark and current status)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 **On Page 71, you state that one of your objectives is: Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds.**

- Can you be more specific on ADA access? Are you currently not in compliance?
- Is it ADA access in regards to parking?
- Is it ADA access in regards to traffic circulation?
- On page 240 in the Facilities Master Plan, it looks like you are not in compliance with the restrooms? Is that the reference?
- Also, did the gymnasium receive new paint in Summer 2017? Should this be part of the athletic improvements in the expanded scope? Why or why not?
- What is the Snack Shack? Isn't that part of the stadium field? That was identified as poor condition?

#### **ADA Compliance**

Category [-]

- The restroom building does not have clearances that meet current ADA standards.

#### **Interior**

Overall Rating: Category [3]

- Interior finishes at Administration have not been updated since modernization except for minor touch-up paint.
- The flooring of the Cafeteria's dining room was replaced or resurfaced in 2004 and is in good condition.
- Rooms 24-25 were rebuilt in 2007, are insulated, and are in good condition.
- Rooms 26-28 were seismically upgraded when CPA was built.
- Rooms 41-43 finishes are in fair to poor condition and in need of an update.
- The Gymnasium received new floors and structural upgrades during 2002 modernization and new interior finishes and additional structural upgrades in 2016. It will receive new paint Summer 2017. The Snack Shack interiors, however, are in poor condition.
- Room 40 (auto shop/wood/robotics/industrial arts) interior finishes show extensive wear and tear. Access/use of the loft is desired.
- Administration building has glue up tiles, fluorescent lighting, VCT flooring throughout with carpet in offices and conference rooms. Finishes are worn and in poor condition.
- Room 6-8 wing has acoustical spray ceiling, VCT floor, tackable walls, and a teaching wall.

## Response to Letter 14-3-g, Bud Get

1. See response to Letter 14-2-x.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 5:26 PM

Subject: RDEIR Feedback: Mitigation Measures under 5-2

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 PROBLEM: You are inconsistent and potentially misleading in how many practices will lights be on:

- Appendix J: VMT Assessment (6 football games)
- Page 35: Mitigation Measure 5-2a: (44 games)
- On page 103 with up to 400 practices and 124 games?

**Questions:**

- In the original DEIR: your mitigation measures identified 37 games but in the RDEIR you are up to 44 games? How are you determining which games or practices should or shouldn't be included in the Mitigation Measures?

2 **Page 35:**

**You State: 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.**

**Questions:**

- Why haven't you prepared and adopted a policy restricting use of pool facilities now as promised in December 2021 Listening Session with Community?
- What would be the specific to that policy?
- Would the policy be different from the stadium to the pool? Would language be exactly the same?
- The word "restrict" doesn't mean no granted permission to the general public. What is your definition?
- How would you make this policy legally upholding?
- How would you define "non-school" related groups?
- How does this interfere with the Civic Act Center? Is this a violation?

3 **You State: 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.**

- Why does this have to be at the first lighted practice or event? Isn't that too late?
- Why can't you hire an energy specialist before final selection of any decisions?
- Can the energy specialist provide recommendations now?
- Do you have current energy-saving strategies? How do you communicate the strategies?
- Have you considered hiring an Energy Specialist, or ES, as the “ face” of an energy conservation program? Typically, an ES ensures the overall implementation of the energy management program and promotes it within the organization. The person in this position is responsible for developing and monitoring the organization’s energy management program under the approved Policy & Guidelines, for the purpose of reducing utility consumption.
- Are there any aspects of this program that CHS is doing, implementing or considering? Energy Efficiency Programs in K-12 Schools A Guide to Developing and Implementing Greenhouse Gas Reduction Programs? You stated one of our objectives is Green Buildings, how does this fit into the strategy?

4 **You State: 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.**

- Our understanding is that Dark-Sky Association won't certify when lights are a certain distance from resident homes.
- On Page 73: Figure 4-1, can you provide exact distances from all the pool lights and proposed stadium to each of the APN homes? Can you expand this to the other side of Highway 1 (East Side)? How close are the poles to physical homes?

## Response to Letter 14-3-h, Bud Get

1. Regarding the number of days (practices and games) the lights will be on, see response to Letter 2b, comment 2.
2. Mitigation Measure 5-2b requires the District's Governing Board to adopt a policy that restricts use of the stadium and pool facility by non-school related groups after dark. Please note that the school district's definition of "non-school" groups, is any group or entity other than Carmel Unified School District, its schools, and programs. Adoption of such a policy would not be a violation of the Civic Center Act as the district's board has the discretion to restrict or prohibit use of school facilities and grounds to preserve order, protect school facilities and grounds, and for safety and/or security reasons. (See Ed. Code, §38133.) District staff must comply with the district's board policies and administrative regulations.
3. Mitigation Measure 5-2c is required to be implemented prior to the first lighted practice or event, and therefore it is not too late. Because this is a mitigation measure that would only be implemented if the Board approves the proposed project and adopts the mitigation measure as part of the MMRP, it would be premature to implement such measure prior to the Board's decision on the EIR and proposed project.

Baseline conditions with respect to energy and GHGs are set forth in Sections 8.0, Energy, and 9.0, Greenhouse Gas Emissions, of the RDEIR.

4. Regarding the comment that the International Dark-Sky Association won't certify when lights are a certain distance from resident homes, the commenter provides no evidence for this assertion. School district staff is in the process of certifying the lighting design and the International Dark-Sky Association has stated that they have no prohibition on certification due to the proximity of residences.

Regarding Figure 4-1, it does present the distance of the proposed project features to the existing homes. Refer to the scale in the lower left corner. No changes to the RDEIR are necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 5:41 PM

Subject: RDEIR: Accurate Input for the Environmental Setting Section of 3.0

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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The RDEIR neglects to include critical historical facts that CMS was always intended to be CHS and the future of growth.

- At what point in history did CUSD Leadership decide not to move forward with moving CHS to CMS? What were the driving decisions?
- In future planning for 3, 5, 10 years, what criteria would you use to decide how to phase the move/activities from CHS to CMS?
- Given you already have parking limitations, traffic circulation problems - why not assess a move of Seniors and Juniors moving to CMS?
- Have you fully explored: **Alternative 4 across all metrics of student population growth, etc?**



(Continued from Page One)

The Colors will be presented by Frank Girard, commander of Carmel American Legion Post No. 512, and will be received by Ronnie Fukagawa, student body vice-president.

Superintendent Stuart Mitchell will make the introduction of honored guests, Dr. Grant Fletcher, past president of the board of education, will present the school, and Robert Fonseca, student body president, will accept the presentation.

Music will be provided by the junior high school band, under the direction of J. W. Larson, and by a mixed chorus under the direction of W. M. Purdy. Mrs. Karen Reed will appear as a soloist. **A staff of junior high students will conduct tours of inspection.**



## Response to Letter 14-3-i, Bud Get

1. This comment is regarding moving all of the high school to the middle school. Relocation of the high school to the middle school campus is not part of the scope of the proposed project, and therefore is not the subject of the RDEIR. Alternative 4 is the alternative in the RDEIR that consists of developing a lighted stadium at the middle school, as an alternative to the proposed stadium lights at the high school. This comment does not raise an environmental issue and therefore, no response is necessary.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 5:44 PM  
Subject: RDEIR Feedback: 3.24 persons per vehicle  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Letter #14-3-j

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#### **PROBLEM/QUESTIONS:**

- Page 287 of RDEIR: You indicate 3.24 persons per vehicle is a reasonable assumption for high school football games and referenced the below high school stadium project CEQA documents were reviewed regarding persons per vehicle.
- However, there was no valid context of how each school is similar in comparison to Carmel High School for any credible benchmark:
  - What is the student population per school?
  - What is the number of parking spaces per school?
  - VMT's imply that schools are using similar busing as CHS? Please describe how that is similar to CHS if that is the benchmark critical to input of VMTs?
  - Do each of the schools have stadiums?
  - How many people attend each game?
  - Do they do ticket sales to validate attendees?
  - Can you please include a reference page to the ceqa along with copies and links?

#### **PROBLEM:**

- FACT: California transportation officials list this stretch of Highway 1 as: "one of the most heavily traveled two-lane highways in the State." 7 SAR 2083.1 This section of Highway 1 is also dangerous: the rate of traffic accidents in this two-lane section of Highway 1 exceeds the state average. 24 SAR 7652. In 1990, traffic reached an average of 40,000 cars per day and an average of 60,000 cars per day at one location on this stretch. 24 SAR 7650.

#### **Mitigation Measures:**

- Vehicle miles traveled (VMT) per capita is calculated as the total annual miles of vehicle travel divided by the total population in a state or in an urbanized area.
- Why can't you use original and appropriate data for this indicator that comes from the Federal Highway Administration (FHWA), 2011 Highway Statistics.
- Why can't you use reports that are based on individual state reports on traffic data counts collected through permanent automatic traffic recorders on public roadways.
- Why can't you attain data on VMT for urbanized areas are available from the FHWA Highway Statistics Series? These data are calculated as the total daily miles of vehicle travel in an urbanized area divided by the total population.
- Can you provide rate of traffic violations and identify root cause to improve traffic circulation?

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**Referenced Resources on Page 287**

Los Alto High School Lights & Public Address System EIR (Los Altos) (2020)  
3.24 persons per vehicle (used Mitty High School data);

Mountain View High School Field Lighting EIR (Mountain View) (2020)  
3.24 persons per vehicle (used Mitty High School data);

Bonita Vista High School Track & Field Project EIR (Chula Vista) (2021)  
3.5 persons per vehicle;

Leuzinger High School IS/MND (Lawndale) (2021)  
2 persons per vehicle;

Grant Union High School IS/MND (Sacramento) (2021) average of  
3 persons per vehicle;

Chavez High School Stadium Seating Expansion (Stockton) (2008)  
4.17 persons per vehicle;

Concord High School and Clayton Valley High School (Concord) (2015)  
2.17 persons per vehicle;

Valley High School Sports Complex (Costa Mesa) (2014)  
4.0 persons per vehicle; and

Hiram Johnson High School Athletic Improvements MND (Sacramento) (2022)  
3.4 persons per vehicle.

## Response to Letter 14-3-j, Bud Get

1. This comment is about the 3.24 persons per vehicle used to estimate the number of additional vehicles that would come to the highly-attended football games, in order to estimate vehicle miles traveled (VMT). The transportation analysis for this EIR was conducted in 2021, when COVID restrictions were in place and high school games were suspended. Hexagon Transportation Consultants used existing data from another high school 3.24 persons per vehicle, to estimate VMT for the proposed project. For the RDEIR, several other metrics were researched to determine if the 3.24 was an adequate number for the VMT analysis. See Section 11.0, Transportation and Parking, page 11-10, for a list of the other high schools and the persons per vehicle used in other CEQA documents for purposes of comparison. The average persons per vehicle for these schools ranged from 2.0 to 4.17 persons per vehicle, with the average persons per vehicle for these school combined equaling 3.19. Therefore, it was determined that 3.24 was adequate for purposes of this RDEIR.

The commenter provides no evidence to suggest that student population, the number of parking spaces, bussing, sporting attendees, ticket sales, or shuttle systems affect the number of people who drive together in one vehicle. No changes to the RDEIR are necessary.

The commenter also provides unsourced Caltrans data, which is not relevant to a proposed project's VMT analysis. Regarding the VMT methodology, see response to Letter 14-3-a. Regarding using Federal Highway Administration (FHWA) statistics from 2011, not relevant for current VMT analysis and therefore, no response is necessary. Regarding providing rates of traffic violations, this is not an environmental issue and therefore, no response is necessary. No changes to the RDEIR are necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 5:36 PM

Subject: RDEIR Feedback: Photo of Morse Street (Visual Confirmation of Street Conditions)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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The largest impacted area of parking overflow is Morse Drive and North Carmel Hills.

These photos show no pedestrian walk-ways, no lights.

Can you simulate what these streets look alike at 10 PM with games letting out?

People will park here, so show what these streets will look like at night at the appropriate time - you are encouraging walking within 1 mile radius?



## Response to Letter 14-3-k, Bud Get

1. This comment is regarding walking to the games, see response to Letter 14-1-q, comment 2. See also discussion of off-site parking and Mitigation Measure 11-4 in Section 11.0, Transportation & Parking, in the RDEIR. No changes to the RDEIR are necessary.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 5:50 PM

Subject: RDEIR Feedback: Photo Visualizing Entrance into Morse off of Highway 1

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

- 1
- How do you plan to prevent people from turning into this residential street, trying to find parking under complete darkness?
  - If you build the new parking lot (tennis courts shown), that will be attracting more traffic with new ingress/egress ways- how does that impact safety, traffic circulation, traffic congestion on Highway 1?
  - There is no traffic light, pedestrian walk-ways etc.
  - Also, the corner is a CalTrans Right of Way. It will not be safe to encourage more car pile-ups at this intersection.



## Response to Letter 14-3-l, Bud Get

1. This comment raises concerns about people parking in the dark using the Morse Drive/State Route 1 intersection, an existing intersection providing access to residences on Morse Drive, as well as to the baseball field parking lot. The proposed new parking lot, which is located immediately northeast of this intersection, includes parking lot lights. See also responses to Letters 14-1-c, 14-1-k, 14-1-m, and 14-2-z.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 5:56 PM  
Subject: RDEIR: Streambed Alterations & The CDFW (Page 217)  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 You state on page 217:

*The CDFW has jurisdiction over the bed and bank of natural drainages according to provisions of Sections 1601 through 1603 of the California Fish and Game Code. Diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that support wildlife resources and/or riparian vegetation are subject to CDFW regulations. Activities that would disturb these drainages are regulated by the CDFW; authorization is required in the form of a Streambed Alteration Agreement. Such an agreement typically stipulates measures that will protect the habitat values of the drainage in question.*

**Questions:**

- Isn't CDFW required to provide feedback and insight on the RDEIR?
- Isn't CUSD required to circle back to CDFW given you've added an entire new scope of work with the ripped out tennis courts? Has / should CDFW reviewed that? It wasn't in the NOP.
- Can you be more specific to where are these drainages that you mention above? What specifically exists in our area? Similar to the Figure 7-1 Habitat Map or the 7-2 Special Status Species, can you breakout where are the drainages regulated by CDFW within 3 mile radius to the project site?
- You underestimate the Biological implications this project will have on Hatton Canyon Park which encompasses 10 acres of wetlands, some 7,700 native Monterey pines, and at least one federally endangered red-legged frog discovered by a CalTrans biologist.

PAGE 201: You state Below. Can you provide a visual map and markings of the referenced locations? Is only one drainage referenced on Figure 7-1?

Adjacent to the project site, on the east side of the football stadium, a hillslope descends down to Flanders Drive. Scattered coast live oak, Monterey pine, and ruderal vegetation occur here. A drainage pipe with flowing water empties just below the stadium creating a small riparian corridor that continues behind the baseball field. This drainage is located approximately 100 feet south of the proposed eastern parking lot and approximately 100 feet southeast of the proposed storage building. Riparian vegetation here is dominated by arroyo willow (*Salix lasiolepis*) and creek dogwood (*Cornus sericea*). At the time of the survey, this area was full of bird activity with much calling and singing. Nesting activity was likely and the species observed here included Wilson's warbler (*Cardellina pusilla*), oak titmouse, golden-crowned sparrow (*Zonotrichia atricapilla*), and Bewick's wren. Mammal species expected to utilize the habitat include California vole (*Microtus californicus*), Botta's pocket gopher (*Thomomys bottae*), striped skunk (*Mephitis mephitis*), California ground squirrel (*Spermophilus beecheyi*), and raccoon (*Procyon lotor*). Other reptile species expected to utilize the habitat include California alligator lizard (*Elgaria multicarinata multicarinata*) and Pacific gopher snake (*Pituophis catenifer catenifer*).



Source: ESRI 2022, Monterey County GIS 2019



Figure 7-1  
**Habitat Map**

Carmel High School Stadium Improvements Revised Draft EIR

## Response to Letter 14-3-m, Bud Get

1. Regarding the California Department of Fish and Wildlife's (CDFW) review of the proposed project. CDFW is not required to provide feedback; however, the school district is required to submit the RDEIR to the State Clearinghouse, which notifies appropriate state agencies, including CDFW, who did review the RDEIR and provided comments. See Letter 131. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.

Regarding the drainage addressed in the RDEIR, its location is identified on Figure 7-1, Habitat Map, with a blue dotted line and the notation "Ephemeral Drainage." Regarding drainages within a three-mile radius, it is not necessary to identify these, as there is no potential for the proposed project to affect them. Regarding Hatton Canyon and the red-legged frog, see response to Letter 2b, comment 4.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 7:17 PM

Subject: RDEIR: Regulated Trees and Impact of Ripping Out Tennis Courts for 18 Foot Road

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[christopher.bjornstad@dot.ca.gov](mailto:christopher.bjornstad@dot.ca.gov)>, <[info-d5@dot.ca.gov](mailto:info-d5@dot.ca.gov)>

1 **PROBLEM** You state On Page 214: Regulated Trees

*The new 18-foot drive aisle along the west end of the football field and the tennis courts **could potentially impact a row of mature Monterey cypress trees (Hesperocyparis macrocarpa)** growing along the western boundary of the campus, adjacent to State Route 1. Several of these trees lean to the east over the proposed route, and can be seen on the aerial photograph in Figure 7-1, Habitat Map. A mature coast live oak (Quercus agrifolia) with exposed roots located immediately east of the proposed drive aisle, could also potentially be impacted by the addition of this drive aisle. The proposed new parking stalls at the existing tennis courts **could also potentially impact two mature coast live oaks, depending upon the amount of grading necessary.** The proposed new parking stalls east of the swimming pool could also potentially impact the mature Monterey pine (Pinus radiata) and several coast live oak trees growing on the hillslope. However, it **appears** that there is adequate buffer space between the trees and the new parking in this area.*

Copying CalTrans because it impacts Scenic Highway 1 and Corridor Program

**Questions and Comments:**

- This is a new scope of work that will be impacting "regulated trees" Why wasn't this included in the Scoping Session? Why wasn't this included in the NOP? Why should this trigger a complete STOP and restart of the whole project?
- Your headline admits that the trees are regulated - can you provide the reference how they are regulated? What protects them? What are the zoning, ordinances, policies that regulate them?
- How are you at risk of violating those regulations?
- What agency regulates the trees? Can you provide citations, guidelines, etc?
- Can you provide specific measurements on where do these trees sit on the boundary line? Are they on CUSD property? Are they on County Property? Is is combo?
- Can you provide a clear map with each tree and show the boundary of where each tree sits?
- Does the regulation fall under Local Plans and Regulations? Monterey County General Plan? Greater Monterey Peninsula Area Plan? Monterey County Ordinance?
- Are you working in good faith and transparency?
- Can you be specific of the risks against which regulations?
- Which agency would regulate which trees?
- What would be the mitigation measure to protect them?



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con't.

- You use the word "appears" - how irresponsible is that for referencing regulated trees? These are iconic protected trees critical to Scenic Highway 1. Why take a risk? DON'T APPROVE!
- Can you be more specific than the word "Appears"? What you trying to say? How would the harm happen?
- Can you provide marking and visual connection to each tree you describe that is in jeopardy?
- You state: *A mature coast live oak (Quercus agrifolia) with exposed roots located immediately east of the proposed drive aisle, could also potentially be impacted by the addition of this drive aisle.* Can you mark which one this is on a map? Who's boundary line does it sit on?
- You state: *The proposed new parking stalls at the existing tennis courts could also potentially impact two mature coast live oaks, depending upon the amount of grading necessary.*

- Can you mark which one these are on a map? Who's boundary line they sit on?
- What activity could potentially harm them?
- You indicate this depends upon the amount of grading necessary - so what is that grading number? What would be the impact if you need that grading number?

- It sounds like ripping out the tennis courts for new parking is not a good idea for several factors (traffic circulation, emergency access routes, risk of harming regulated trees, violating Scenic Highway 1 Corridor Program) so why continue the evaluation?
- Can't you assess moving parking requirements to other locations like the parking up the green open areas of the amphitheater and where the current parking is?
- Why don't we see real measurements and specs to this design?
- Where are the actual measurements from the trees to any proposed roadways?
- Where are the exact measurements of all this to Scenic Drive? You provide a basic yellow outline on a map but NO real measurements, actual feet, etc
- Can you be specific to zoning requirements of 100 feet set-back to Scenic Drive?
- Wouldn't removing the trees no longer qualify the highway as protected? Who is the agency that could speak on this?
- Can you be specific about the count of the trees in this section? How many trees are there in that zone? and what is there height, width?
- If the regulated trees get harmed, doesn't that increase the light pollution of the stadium lights to Scenic Highway 1?
- What is the amount of grading necessary?
- How are we to give feedback in concept stage? This should not be in the scope if not stable design.

**Regulated Trees (Can you provide a simple number? Is that too complicated)? What is the total?**

- The new 18-foot drive aisle along the west end of the football field and the tennis courts could potentially impact
- a row of mature Monterey cypress trees (*Hesperocyparis macrocarpa*) growing along the western boundary of the campus, adjacent to State Route 1. (HOW MANY EXACTLY)?
  - A mature coast live oak (*Quercus agrifolia*) with exposed roots located immediately east of the proposed drive aisle, could also potentially be impacted by the addition of this drive aisle.
  - The proposed new parking stalls at the existing tennis courts could also potentially impact two mature coast live oaks, depending upon the amount of grading necessary.
  - The proposed new parking stalls east of the swimming pool could also potentially impact the mature Monterey pine (*Pinus radiata*)
  - several coast live oak trees growing on the hillslope.

However, it appears that there is adequate buffer space between the trees and the new parking in this area.

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con't.



① Existing paved pedestrian path looking south from western edge of stadium track



② Existing paved pedestrian path looking north from tennis courts

## Response to Letter 14-3-n, Bud Get

1. This comment is about the potential to damage trees associated with construction of the parking lots at the tennis courts and the drive aisle to the new parking lot. There are approximately 15 trees in this location, between the proposed drive aisle and State Route 1. The trees are mature, and from an historical review using Google Earth, many of the trees that were there 10 years ago have died (<https://www.google.com/earth/versions/>).

Regarding the NOP, see response to Letter 14-2-c, comment 2.

Regarding how the RDEIR addressed the potential removal of the trees, Section 7.0, Biological Resources, evaluates the potential for trees to be damaged or removed, although none are proposed for removal. The location of the trees is identified in Figure 7-1, Habitat Map. As discussed on page 7-32 of the RDEIR, although project plans do not call for the removal of any of these trees, the planned construction of a new drive aisle and parking spaces could potentially jeopardize tree health through damage to roots and paving under tree driplines, resulting in the potential need to remove the trees. Mitigation Measure 7-6 states, “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.”

The trees are on school district property and the school district has exempted itself from Monterey County regulations. See response to Letter 11b, comment 16, and response to Letter 2b, comment 4 and Figure 7-1, Habitat Map, in Section 7.0, Biological Resources, of the RDEIR for the location of trees. To further highlight the location of the trees with the potential to be impacted by the proposed project, a revision has been made to Figure 7-1 as reflected in Section 3.0, Changes to the Revised Draft EIR, of this final EIR.

Regarding turning the lawn area and amphitheater into parking, see response to Letter 14-3-c.

With respect to public notice and transparency, please refer to responses to Letter 11b, comment 16, and Letter 14-1-u, comment 1.

Regarding Scenic Drive, it’s not clear to what the commenter is referring. There is a Scenic Drive in Pebble Beach, which is not in the immediate vicinity of the high school.

If trees are removed, new trees would need to be planted, in accordance with Mitigation Measure 7-6, as discussed above. See also response to Letter 2b, comment 2 regarding a landscape plan.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 7:19 PM  
Subject: RDEIR: Outstanding CPRA Requests that Impact Feedback into the RDEIR  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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**PROBLEM:**

The following outstanding CPRA requests have not been completed by CUSD and are critical inputs to the accurate feedback on the RDEIR.

**2223\_41 Session (JCUSD) / Request**

**2223\_39 Higgins (Budget) / Request**

**2223\_38 Ment (Budget) / Request**

**2223\_36 Nissim / Request**

**2223\_33 Lights (Budget) / Request / Responsive Documents**

**2223\_32 Sources (JCUSD) / Request / Initial Response**

**2223\_31 Impacts (JCUSD) / Request / Initial Response**

**2223\_30 Sources (JCUSD) / Request / Initial Response**

**2223\_29 Sources (JCUSD) / Request / Initial Response**

**2223\_28 Plans (JCUSD) / Request / Initial Response**

**2223\_27 Mit (Budget) / Request / Initial Response**

**2223\_21 Briggs / Request**

**2223\_23 Notice (Budget) / Request / Initial Response**

**2223\_15 CUSD Parents (Bee Safe) / Request**

**2223\_14 Concerned Carmel Residents (Bud Get) / Request**

**2223\_08 Kahn / Request**

**2223\_07 Kahn / Request / Initial Response**

**2223\_05 Dillard / Request / Initial Response**

**2223\_04 Kahn / Request / Initial Response**

**2223\_01 Concerned Carmel Residents / Request / Initial Response**

**2223\_23 Public Notice / Request**

- Demonstrates whether CUSD properly engaged in the community at the right times with accurate information

**2223\_22 DSA NOE / Request**

- Demonstrates whether CUSD properly filled out required forms and 810 Fire Safety Requirements

**2223\_19 Base Ball / Request**

- Demonstrates whether CUSD properly filled out required CEQA/NOE forms and has an existing Emergency Access Plan.
- Athletic Improvements, parking and location of alternatives should include the baseball field. If we are to consider options as a whole for alternatives, please provide baseline insights.

**2223\_18 Save Carmel / Request**

- Transparency if DSA plans have been provided regarding any aspect of the proposed construction or plans in the RDEIR.
- None have been included in the RDEIR. Several new scopes of work in concept stage and are in flux. Unclear how we are to evaluate anything.

**2223\_17 Bud Get / Request**

- Given the swimming pool lights are a new part of the scope of the project, more insight is required on how we got here and whether proper process was followed

**2223\_15 CUSD Parents (Bee Safe) / Request**

- RDEIR does not acknowledge chronic history of parking, safety and speeding challenges before they introduce further complexity in an area already plagued with safety challenges.
- This CPRA will help demonstrate that CUSD is not providing the resources they promised for the parking overspill that is currently happening.
- **It is further request the RDIER includes historical reporting on the number of parking and speeding tickets issued in the surrounding 1 mile radius of the school.**

**2223\_12 Concerned Carmel Residents (Bud Get) / Request**

- Demonstrates CUSD may not have been following proper procedures in the CEQA / NOE process for projects on their campus that are now included in the RDEIR and/or have an impact on the current Environment

**2223\_08 Kahn / Request**

- Requests transparency and access to measurement of light data for the swimming pool lights that is now part of the RDEIR.

In addition, all the below outstanding CPRA requests are critical inputs into assessing the RDEIR. CUSD may want to revisit the outcome of this case:



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- *CASE No 20CV002707: May 2022 Motion for awarding Attorney fees and costs Under the California Public Records Act.*

**2223\_08 Kahn / Request**

**2223\_07 Kahn / Request / Initial Response**

**2223\_04 Kahn / Request / Initial Response**

**2223\_02 Kahn / Request / Initial Response**

**2223\_01 Concerned Carmel Residents / Request / Initial Response**

## Response to Letter 14-3-o, Bud Get

1. The comment is about California Public Records Act requests submitted by the commenter. CPRA requests, past projects, baseball field facilities, and other purported issues identified in the comment are not the subject of the RDEIR. It does not raise an environmental issue and therefore, no response is necessary.

For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.

With respect to baseline conditions, please refer to Section 3.0, Environmental Setting, and the Environmental Setting subsection under each environmental topic category section in the RDEIR.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 7:20 PM  
Subject: RDEIR: No Plan for Litter Being Generated  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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**PROBLEM:**

For a more sustainable plan, you are not addressing the potential increase in litter being generated. The current litter generated before and after the events is unsightly. Carmel High makes no attempts to pick up litter generated by events it sponsors.

What is the plan now and what will it be during the increased attendance?

**Mitigation Measure:**

- Visually show where current litter is being captured and the proposed plan to increase with new level of attendees.

## Response to Letter 14-3-p, Bud Get

1. This comment is about the potential for litter being generated by the proposed project. Alleged past incidents of littering are outside the scope of the RDEIR and the CEQA process. It does not raise an environmental issue covered under CEQA and therefore, no response is necessary. However, the District has been made aware of this concern based on this comment, and will share it with appropriate personnel.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 7:34 PM

Subject: RDEIR Feedback: Historical Context that Growth Should be Focused at CMS

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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"The Board of Education then gave serious consideration to moving the high school to the CMS campus because they had room to expand," Wright says.

This shift could have accommodated the increasing numbers of CUSD students.

While the possibility of expansion was more than likely at CMS, most teachers at CHS were against the move, fearing the loss of the "country club" beauty the high school has retained, Wright notes. Despite the abundance of space, there were other issues with the move, such as inadequate sporting facilities and a lack of natural light.

As it appears, the Board of Education accurately predicted the tsunami of students, as CHS classrooms were filled to the brim with teenagers, Wright says.

"I was teaching in Salinas then and the CHS campus was packed," Wright says. "Classrooms were scheduled every period of every day and jammed with as many desks as they could stuff into the rooms!"

After the baby boomers went through the district and eventually graduated, the number of CHS students gradually decreased and has begun to slowly climb again throughout the past few years.

This hypothetical switch has not been considered since; however, it is an interesting option considering the general desire of the CHS population to have lights on the sports fields and issues with parking.

-Annalise Krueger

## CMS Padres? The campus switch that almost was

Carmel High School students and graduates have witnessed numerous recent improvements to the campus, including renovations to the stadium, science wing and performing arts center; however, the vast majority are unaware of the historic decision that was made to improve upon the CHS campus in its current location, rather than move the high school down to the much larger middle school campus.

The property of Carmel Middle School, originally owned by William Hatton, was purchased in 1961 by the Carmel Unified School District, according to CMS teacher Anna Williams, a descendant of Hatton. Before the opening of the then-grades 6-9 school, the property had been used as a dairy farm for the Hatton family.

"I believe it was 1961 when it was sold, and construction began later that year, resulting in a 1963 opening of the middle school," Williams says.

Originally, CMS was built with the intention of later becoming the high school campus. The January 1963 edition of the Carmel Pine Cone reads, "It is a school of the future both in orientation and use. According to plans, it will one day become a senior high school."

The Pine Cone notes that the objective was to have the high school located at the CMS property and have two junior high schools: one at the location of CHS and the other in the valley.

This option was explored based on CMS's expansive space, numerous sports fields, possibility of an additional gymnasium and ample parking, according to Board of Education member Karl Pallastrini, formerly a principal at both CMS and CHS. Pallastrini notes that because CMS was built at a time without neighborhoods nearby, heavily attended events and stadium lights would not have been an issue.

"During the final stages of construction, sentiment from the community and the School Board at the time changed, and the decision was made to keep CHS at its current and only location," Pallastrini says. "What happened then was a rare change of vision that you would never see happen today."

After construction, the notion was completely dropped for two decades until CUSD Board of Education noticed a significantly large surge in class sizes as the baby boomers enrolled in local elementary schools, according to former CHS teacher and graduate Jeffrey Wright.

"The Board of Education then gave serious consideration to moving the high school to the CMS campus because they had room to expand," Wright says.

This shift could have accommodated the increasing numbers of CUSD students.

While the possibility of expansion was more than likely at CMS, most teachers at CHS were against the move, fearing the loss of the "country club" beauty the high school has retained, Wright notes. Despite the abundance of space, there were other issues with the move, such as inadequate sporting facilities and a lack of natural light.

## Response to Letter 14-3-q, Bud Get

1. The email subject in the comment letter states “Historical Context that Growth Should be Focused at CMS;” however, the text included appears to be extracted from an unsourced document, which does not include the beginning or the end. The text is not about the proposed project and therefore, no response is necessary.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 7:33 PM

Subject: RDEIR Feedback: Back Entrance: Traffic Circulation, Safety, Orange Cones, Implications to new 18 Foot Road

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>,

<[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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**PROBLEM:**

You state you want to improve traffic circulation as one of your objectives.

**Mitigation Measure:**

- Isn't the first standard step to improving traffic circulation is to conduct a Vehicle Circulation Study?
- Can you include in the Vehicle Circulation study this back entrance off of Highway 1 that is consistently backed up in traffic congestion with student drop-off and pick-up on a daily basis?
- Why are there always orange cones with tape in the area? (you can see in this photo)
- Can you clarify the firelane implication to this entrance and what is inside? It looks like no marking on Figure 3-6
- If you can't manage daily traffic circulation (866 students), how will you demonstrate even a small increase in athletic events such as soccer?
- How would the new 18 foot roadway work at the top of the entrance to this? Wouldn't it create a further cluster "f" with the two merging points? Is that safe?





## Response to Letter 14-3-r, Bud Get

1. This comment is about the project objective to improve traffic circulation, as well as the existing traffic circulation setting. Traffic and circulation were studied. Please refer to Section 11.0, Transportation and Parking, of the RDEIR. Additional on-site parking is included in the project description, which would assist with ingress, egress, and circulation. Additionally, a Traffic Management Plan (Mitigation Measure 11-4) would be implemented during highly-attended games. Please also see response to Letter 14-3-e.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 7:42 PM  
Subject: NOP Feedback from TAMC  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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In the NOP, TAMC states:

*3. The Agency encourages the study to evaluate all potential special events that might be conducted in the evenings, including (but not limited to): evening practices for sports teams, graduation ceremonies, club sporting events, and concerts. The EIR should identify steps needing to be taken before allowing unanticipated events to occur that were not evaluated in the study (e.g., conditions of approval requiring a study to be conducted if the event is expected to generate more peak hour trips than evaluated in the EIR).*

**Question: Why is the RDEIR only focused on 4 to 6 Football Games? Shouldn't CUSD be providing a bigger perspective?**

**The Agency recommends coordination with Monterey-Salinas Transit for consideration of transit connections to and from the Stadium. Monterey-Salinas Transit's Designing for Transit Guideline Manual should be used as a resource when considering potential transit access to the projectsite.**

**Questions:**

- Isn't there a MST transition connection right near the school entrance?
- Can CUSD provide plan to encourage the use of this service for game attendees?
- What are the schedules and how might it be incorporated into any TMP for even daily use?

## Response to Letter 14-3-s, Bud Get

1. The RDEIR does not focus on 4 to 6 football games. See Section 4.0, Project Description, as well as all of the areas of environmental analysis. Regarding the Vehicle Miles Traveled (VMT) worst-case analysis methodology, see response to Letter 14-3-a.

Monterey-Salinas Transit (MST) does not provide bus service along State Route 1 in the vicinity of the school, although it does have a route from State Route 1 to Carpenter leading to downtown Carmel-by-the-Sea. However, as noted by the commenter, the Transportation Agency for Monterey County (TAMC) did recommend in their NOP comment letter that the school district coordinate with MST for consideration of transit connections to and from the stadium. Monterey-Salinas Transit's Designing for Transit Guideline Manual should be used as a resource when considering potential transit access to the project site. The school district may contact MST to discuss the option of MST providing this service. However, implementation of this would be the decision and responsibility of MST and therefore, there is no guarantee that it would be implemented.

No changes to the RDEIR are necessary.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 7:37 PM

Subject: RDEIR Feedback: Stated Objective is Improve Traffic Circulation (Photo of Intersection 1 and CHS Entrance)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 **Stated Objective is Improve Traffic Circulation**

- CHS's entrance is limiting to traffic flow - entrance doesn't allow for proper traffic circulation. Do you agree? Won't the entrance to the school always limit the ability to improve traffic circulation?
- Providing this photo to show unsafe walking condition from post the light to the front of CHS entrance. How do pedestrians get to North Carmel Hills safely?
- There are no school markings or safe crossings.





## Response to Letter 14-3-t, Bud Get

1. This comment is regarding the objective to improve traffic circulation. See response to Letter 14-2-f and 14-3-e.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 7:39 PM  
Subject: RDEIR: Pool Policy in Mitigation Measure 5-2b  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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*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.*

The existing pool facility was completed in 2007 with no CEQA process or signed and filed Notice Of Exemption. The community was not given the opportunity to engage in the build out of the pool or the installation of the existing pool lights. The community's complaints on the light pollution and usage policy has consistently fallen on deaf ears.

Again with new leadership, Ted Knight stood in front of a Community Listening Session and promised he would fix the light pollution from the pool lights (Attachment). AGAIN, no action or resolution for improvement but instead hold hostage the fix to the approval of stadium lights that no one in the community wants. In addition, it was promised that a policy that restricts the use of the pool facility by non-school related groups after dark would be adopted. AGAIN, no action or resolution. Please see the attached usage of outside groups (evidence that CUSD has no credibility to keep their word or adopt true change). This is all "lip service" to get stadium lights.

**Questions:**

- Why haven't you adopted a policy that restricts the use of pool facilities by non-school related groups after dark already?
- How would a policy be a legally binding document? There is so much leadership change at CUSD, it's more than likely to change.
- Why should anyone believe you on the stadium lights if you haven't implemented anything credible on the pool lights SINCE 2007!

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Attachments (Evidence)

- December 8th CUSD Town Hall: Superintendent admission to the light pollution from the pool, promise to fix light pollution AND change pool usage policy.
- List of all outside non-school related groups using the pool after dark including revenue made by CUSD
- DSA Project Submission of Pool that excludes an 810 Fire and Life Safety Form



[DSA Stamped for Pools\\_107553\\_files.pdf](#)

RENTER	APPROVED #	APPROVED \$
MBU Water Polo Foundation	10	\$33,376.52
Seaside Aquatic Club	13	\$31,246.37
Legacy Water Polo	7	\$15,984.23
Monterey Bay Swim Club	4	\$17,804.38

# Carmel Unified HS Neighborhood Community Meeting

December 8th 2021



# Stadium Light Project Summary

As a quick recap, I want to provide a little history on the iterative process of this project.

- As a result of the facilities master plan, which was created with input from a variety of stakeholders, including students, staff, parents, and community members, the concept of stadium lights was identified by district staff and the board of education as a priority project due to the new late start law requiring implementation in the 2022-23 school year.
- The district determined that the project would require an environmental impact report (EIR) and engaged with consultants to prepare the EIR as well as architects to prepare the design documents.
- The design documents were completed by the architects and are currently in review at the division of state architects.
- Per 14 CCR § 15082 the district published the Notice of Preparation (NOP) for the EIR May 12th, 2021 and during the following 30 day review period, the district received approximately 16 responses. The purpose of the NOP is to solicit input from agencies, organizations and the public on the scope and content of the environmental information to be included in the Draft Environmental Impact Report (DEIR).
  - Although not required the District took the additional step of sending notification mailers to neighbors near Carmel High.
- The EIR scoping meeting was conducted at the May 26th school board meeting. The purpose of a public scoping meeting is to inform the public that the lead agency, CUSD, is evaluating a project under the California Environmental Quality Act (CEQA) and to solicit public comment regarding the type and extent of environmental analyses to be undertaken. At the scoping stage, the project design is not completed, and general information is available to provide to the public. The District describes the preliminary concept of the project, and asks for feedback.

# Stadium Light Project Summary

- The comments from the review period as well as the scoping meeting were shared with the EIR consultants and addressed during the EIR process.
- Per 14 CCR § 15087 the draft EIR was completed and made available in August of 2021 and comments were received during the following 45 day review period and continue to be compiled by the district. A draft EIR assesses how, if implemented, the project will impact resources like air quality, water, land use, biological resources, greenhouse gas emissions, and more. As part of the analysis, the draft EIR includes environmental mitigation tactics to ensure a balanced approach
  - Although not required, the District posted the legal notice of availability in an additional local newspaper, and sent notices to neighbors near Carmel High.
- At the conclusion of the 45 day review period, seeing several themes of concern, the superintendent decided to host a listening session where he could hear first-hand the concerns and engage in a dialogue with those community members who had voiced concerns.
- The superintendent took the information from the written comments, as well as from the listening session and met with the districts Director of Facilities Dan Paul, district legal counsel, local officials, and EMC planning group to discuss how to best mitigate the concerns.
- The plans for mitigation are intended to be included in the final EIR presented to the board of education.
- However, as this topic continues to create concern for our community the superintendent is again adding an additional step, not required by law, and having this additional listening opportunity.

## Summary of Current Concerns

- General concern with the EIR process and resulting documents.
- Light pollution and the need to have the stadium lights dark skies certified as well as specific information on the power of the lights.
- Current light pollution with aquatic lights
- Lights in the back of the high school that perceived as visually unappealing.
- Parking, not only parking during current events but also during the day. This is a concern that many felt would be exacerbated if the district instituted night games. Students are currently parking in residential neighborhoods, blocking mailboxes, making unsafe conditions for emergency vehicles, and speeding.
- Concern that night games would bring increased trash, and unsafe behaviors.
- Limited ability to visualize the height of the light poles.
- The Civic Center Acts allows the community to rent out facilities and there is concern about renting out the facilities and increasing time when lights will be on.
- Concerns of trust and a history of not listening to the community or considering their desires.



# Mitigation Plans

## Offsite Parking Around the School

- I did a quick tour of the HS neighborhood this morning and I did not notice anyone illegally parked in front of the “no parking” signs in the neighborhood, where we have been patrolling. Therefore, I am hopeful that we can change behavior with continuing to enforce those signs, and any additional signs that we will be requesting from the county.
- However, there were 2 cars illegally parked on the CalTrans property and we will be addressing that with local law enforcement.

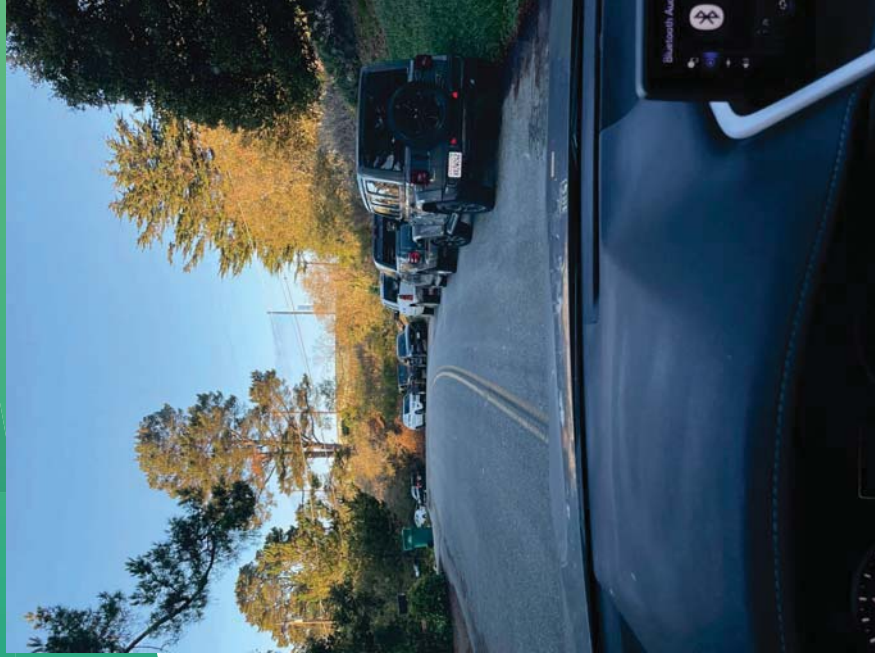
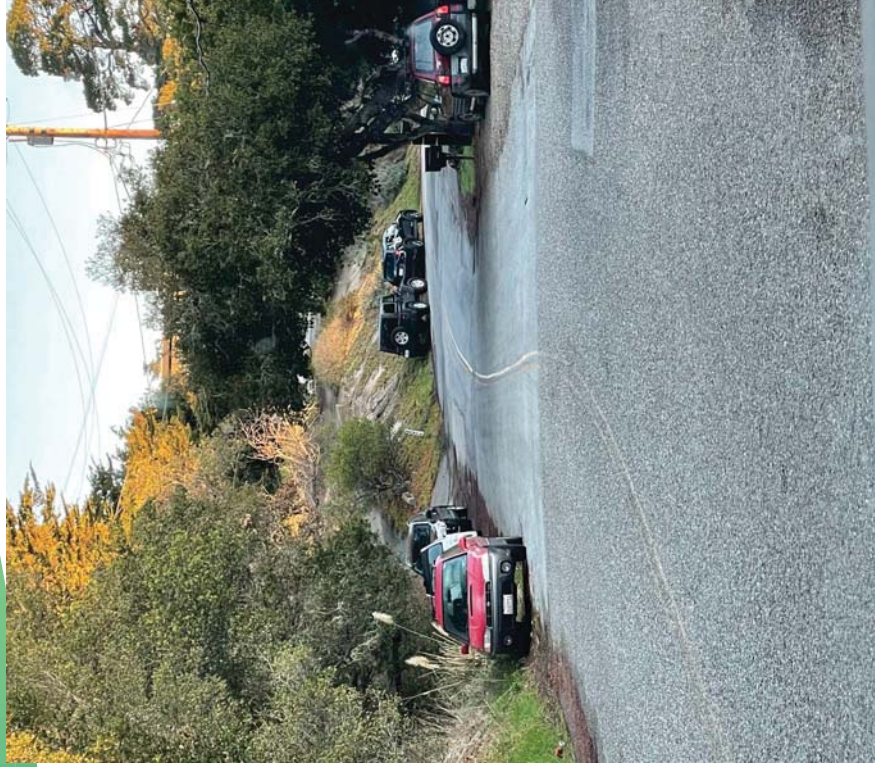


# Mitigation Plans cont.

## Offsite Parking Behind the School

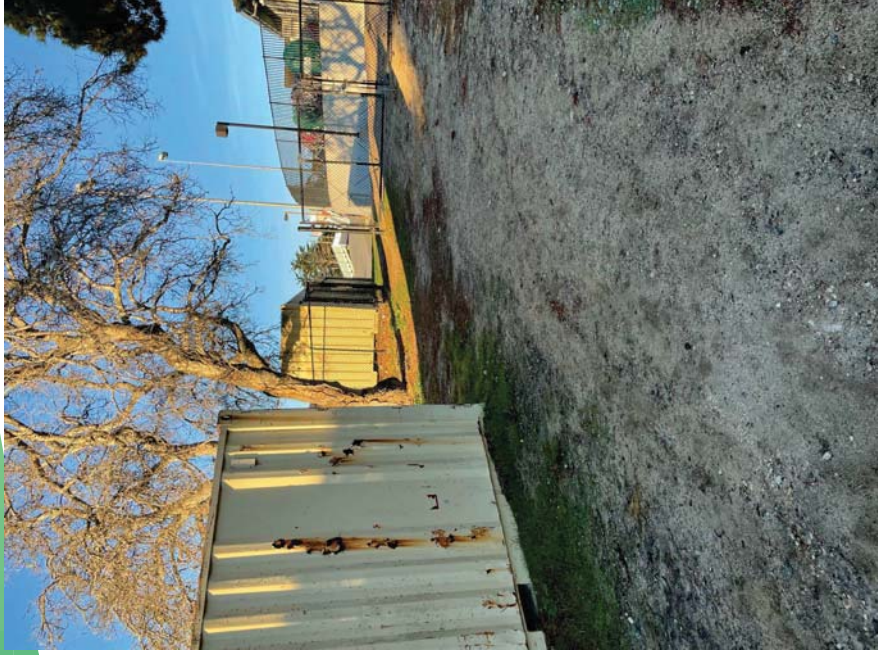
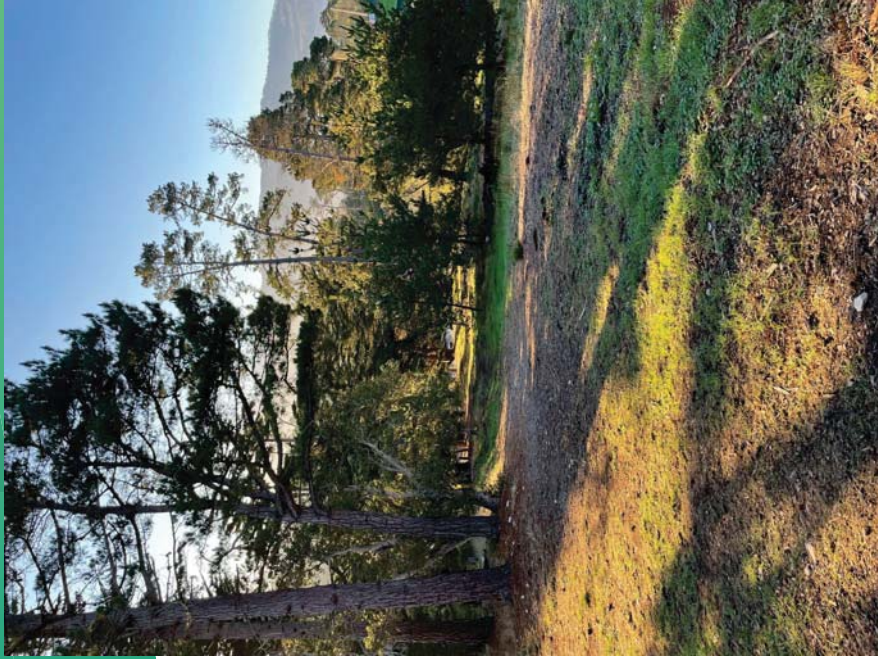
- I spent quite a bit of time behind the HS this morning on Flanders Drive.
- After just a few short minutes, I can understand why our neighbors are upset.
- There were 15 student cars parked on Flanders, at that time there were over 50 available parking spots available in the school parking lot.
- I did not witness inappropriate behavior, trash, noise, etc. But there was a definite increase in traffic and parking in front of homes.
- I did notice cars speeding, however, it seemed to be almost all traffic and not just students. It does look like there are speed limit signs posted.
- The students appear to have to walk on a residential driveway to get to the path to enter the back of the school.
- The path students take is not supervised, not safe, and they enter an unlocked gate at the back of the school.

# Mitigation Plans cont.





# Mitigation Plans cont.



## Mitigation Plans cont.

- The high school will be shifting all staff parking to the rear and sides of the school, opening up more student parking spots in the front lot. Starting tomorrow, Dec. 9th, 2021, there will be staff on Flanders supervising students and explaining that come Jan. 4th, 2022 the gate will be locked and students will no longer have access to the school from Flanders Dr. A staff member will be supervising the rear of the school until parking has ceased and to make sure that students do not try and access the building from Flanders. Communication about this change will be going out to students and families this week.
- The district is currently soliciting proposals for a traffic study/management plan, that will include the following:
  - Increased no parking areas around the school, in terms of time and length, and additional strategies such as residential parking only areas
  - Temporary no parking areas that will be displayed during events
  - Support of speed limit changes in the area
  - An event parking plan that will increase traffic control officers and parking lot monitors who will direct all visitors, handicapped vehicles, and elderly to the main parking lots and Carmel USD students and families to the middle school to take the shuttle. Shuttle usage will be incentivized with free admission to the event.
- Part of the districts solicitation of proposals is to include a follow up study to assess the effectiveness of the traffic management plan.
- The district has worked with a designer and is currently planning for an additional 35-45 parking spots at the high school in the coming months with an additional 60-80 parking spots planned in the next year. This would completely eliminate the need for offsite parking on a daily basis.

## Mitigation Plans cont.

- Scheduling of events so there are not multiple events on campus at the same time, where parking would become an issue.
- Increased presence of law enforcement and security at night events - The district has received confirmation that the MOU between the county and state allows our local law enforcement officials, including our school resource officer, to issue tickets surrounding the school. The district is also planning on moonlighting officers for events.
- District legal counsel is currently revising Board Policy 1330 and an updated policy that prohibits the renting out of facilities that require lights will be presented to the Board in Dec, 2021. Currently, we rent out the aquatic facility approximately 75 times a year when lights are utilized. This change in policy will eliminate these rentals and their use of lights.
- The district has applied for dark sky certification and have received certification of the plans. The district will also be applying for field verification if and when the lights are installed.
- The district is currently in the design phase of replacing our current pool lights with dark sky certified lights that we anticipate will be installed in 6-9 months.
- The district has replaced the light bulbs, fixtures, and changed the paint directly below the lights at the back of the school.
- The district is currently assessing the feasibility of a story balloon to demonstrate the height of the light poles, as a story pole is not feasible at this time.
- The district will be partnering with a fee-based video service to televise events that should help with capacity.



# CUSD Upcoming Outreach

- At the Dec. 2021 CUSD Board of Education meeting, the superintendent will be updating the school board on progress made in mitigation strategies.
- The superintendent will be explaining, to the Board of Education, that due to ongoing community concerns and recent advocacy for community legal action that more information is needed to and from the community. The superintendent will be reaffirming the link between late start and stadium lights and suggesting that he inform the community and survey them on their input moving forward.
- Specifically, the superintendent will describe and inquire into the desires of the greater community on the following scenarios:
  - Move ahead with late start and recommend stadium lights to the board, risking legal action that could put the high school in a position where it has late start and limited ability to extend practice. (sample schedules will be provided)
  - Delay late start by one-year to further mitigate concerns and hopefully eliminate the risk of a legal battle.
  - Move completely away from the concept of late start, partially eliminating the need for stadium lights.
  - Move completely away from the concept of stadium lights, creating a dilemma of how to practice and meeting stated student needs.

A graphic consisting of a green triangle pointing to the right, with the text "CUSD Outreach" written in white inside it.

# CUSD Outreach

## Comments and Questions

*Please raise your hand and I will come around with the microphone and answer each question before moving on*

Please give us your name and email address before you leave if you want to be added to our email list.

RENTER	APPROVED #	APPROVED \$	CONTACT	PHONE	USERS
MBU Water Polo Foundation	10	\$33,376.52	[REDACTED]	[REDACTED]	Jonathan Burke
Seaside Aquatic Club	13	\$31,246.37	[REDACTED]	[REDACTED]	Kenneth Fittrd Tina Cier
Legacy Water Polo	7	\$15,984.23	[REDACTED]	[REDACTED]	Brett Luch
Monterey Bay Swim Club	4	\$17,804.38	[REDACTED]	[REDACTED]	Trent Larsen

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Musco Control-Link Usage Report								
By Facility and Field								
Usage Type of Light Usage								
Fri 01/01/2010 - Thu 08/18/2022								
Note: Hours and Minutes are shown in decimal format to allow totaling and calculations.								
Schedule Detail:								
Facility	Start Day	Start Date	Start Time	End Day	End Date	End Time	User Group	Auto Hours Usage
Carmel High School	Mon	1/4/2010	4:45a	Mon	1/4/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	1/4/2010	4:34p	Mon	1/4/2010	6:15p	BAMP	1.68
Carmel High School	Tue	1/5/2010	4:35p	Tue	1/5/2010	7:15p	BAMP	2.67
Carmel High School	Wed	1/6/2010	4:45a	Wed	1/6/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	1/6/2010	4:35p	Wed	1/6/2010	7:15p	BAMP	2.67
Carmel High School	Thu	1/7/2010	4:36p	Thu	1/7/2010	6:15p	BAMP	1.65
Carmel High School	Fri	1/8/2010	4:45a	Fri	1/8/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	1/8/2010	4:37p	Fri	1/8/2010	7:15p	BAMP	2.63
Carmel High School	Mon	1/11/2010	4:45a	Mon	1/11/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	1/11/2010	4:40p	Mon	1/11/2010	7:15p	BAMP	2.58
Carmel High School	Tue	1/12/2010	4:41p	Tue	1/12/2010	7:15p	BAMP	2.57
Carmel High School	Wed	1/13/2010	4:45a	Wed	1/13/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	1/13/2010	4:42p	Wed	1/13/2010	7:15p	BAMP	2.55
Carmel High School	Thu	1/14/2010	4:43p	Thu	1/14/2010	6:15p	BAMP	1.53
Carmel High School	Fri	1/15/2010	4:45a	Fri	1/15/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	1/15/2010	4:44p	Fri	1/15/2010	7:15p	BAMP	2.52
Carmel High School	Mon	1/18/2010	4:45a	Mon	1/18/2010	7:00a	Adult Masters	2.25
Carmel High School	Tue	1/19/2010	4:48p	Tue	1/19/2010	7:15p	BAMP	2.45
Carmel High School	Wed	1/20/2010	4:45a	Wed	1/20/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	1/20/2010	4:49p	Wed	1/20/2010	7:15p	BAMP	2.43
Carmel High School	Thu	1/21/2010	4:50p	Thu	1/21/2010	6:15p	BAMP	1.42
Carmel High School	Fri	1/22/2010	4:45a	Fri	1/22/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	1/22/2010	4:51p	Fri	1/22/2010	7:15p	BAMP	2.4
Carmel High School	Mon	1/25/2010	4:45a	Mon	1/25/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	1/25/2010	4:55p	Mon	1/25/2010	7:15p	BAMP	2.33
Carmel High School	Tue	1/26/2010	4:56p	Tue	1/26/2010	7:15p	BAMP	2.32
Carmel High School	Wed	1/27/2010	4:45a	Wed	1/27/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	1/27/2010	4:57p	Wed	1/27/2010	7:15p	BAMP	2.3
Carmel High School	Thu	1/28/2010	4:58p	Thu	1/28/2010	6:15p	BAMP	1.28
Carmel High School	Fri	1/29/2010	4:45a	Fri	1/29/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	1/29/2010	4:59p	Fri	1/29/2010	7:15p	BAMP	2.27
Carmel High School	Mon	2/1/2010	4:45a	Mon	2/1/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	2/3/2010	4:45a	Wed	2/3/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	2/5/2010	4:45a	Fri	2/5/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	2/8/2010	4:45a	Mon	2/8/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	2/10/2010	4:45a	Wed	2/10/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	2/10/2010	5:12p	Wed	2/10/2010	7:15p	BAMP	2.05
Carmel High School	Thu	2/11/2010	5:13p	Thu	2/11/2010	7:15p	BAMP	2.03
Carmel High School	Fri	2/12/2010	4:45a	Fri	2/12/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	2/12/2010	5:14p	Fri	2/12/2010	7:15p	BAMP	2.02
Carmel High School	Mon	2/15/2010	4:45a	Mon	2/15/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	2/17/2010	4:45a	Wed	2/17/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	2/17/2010	5:19p	Wed	2/17/2010	7:15p	BAMP	1.93
Carmel High School	Thu	2/18/2010	5:20p	Thu	2/18/2010	7:15p	BAMP	1.92
Carmel High School	Fri	2/19/2010	4:45a	Fri	2/19/2010	7:00a	Adult Masters	2.25

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Carmel High School	Fri	2/19/2010	5:21p	Fri	2/19/2010	7:15p	BAMP	1.9
Carmel High School	Mon	2/22/2010	4:45a	Mon	2/22/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	2/22/2010	5:24p	Mon	2/22/2010	7:15p	BAMP	1.85
Carmel High School	Tue	2/23/2010	5:25p	Tue	2/23/2010	7:15p	BAMP	1.83
Carmel High School	Wed	2/24/2010	4:45a	Wed	2/24/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	2/24/2010	5:26p	Wed	2/24/2010	7:15p	BAMP	1.82
Carmel High School	Thu	2/25/2010	5:27p	Thu	2/25/2010	7:15p	BAMP	1.8
Carmel High School	Fri	2/26/2010	4:45a	Fri	2/26/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	2/26/2010	5:28p	Fri	2/26/2010	7:15p	BAMP	1.78
Carmel High School	Mon	3/1/2010	4:45a	Mon	3/1/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	3/1/2010	5:31p	Mon	3/1/2010	7:15p	BAMP	1.73
Carmel High School	Tue	3/2/2010	5:32p	Tue	3/2/2010	7:15p	BAMP	1.72
Carmel High School	Wed	3/3/2010	4:45a	Wed	3/3/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	3/3/2010	5:33p	Wed	3/3/2010	7:15p	BAMP	1.7
Carmel High School	Thu	3/4/2010	5:34p	Thu	3/4/2010	7:15p	BAMP	1.68
Carmel High School	Fri	3/5/2010	4:45a	Fri	3/5/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	3/5/2010	5:35p	Fri	3/5/2010	6:30p		0.92
Carmel High School	Fri	3/5/2010	5:35p	Fri	3/5/2010	7:15p	BAMP	1.67
Carmel High School	Mon	3/8/2010	4:45a	Mon	3/8/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	3/8/2010	5:38p	Mon	3/8/2010	7:15p	BAMP	1.62
Carmel High School	Tue	3/9/2010	5:39p	Tue	3/9/2010	7:15p	BAMP	1.6
Carmel High School	Wed	3/10/2010	4:45a	Wed	3/10/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	3/10/2010	5:40p	Wed	3/10/2010	7:15p	BAMP	1.58
Carmel High School	Thu	3/11/2010	5:41p	Thu	3/11/2010	7:15p	BAMP	1.57
Carmel High School	Fri	3/12/2010	4:45a	Fri	3/12/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	3/12/2010	5:42p	Fri	3/12/2010	7:15p	BAMP	1.55
Carmel High School	Mon	3/15/2010	4:45a	Mon	3/15/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	3/15/2010	6:44p	Mon	3/15/2010	7:15p	BAMP	0.52
Carmel High School	Tue	3/16/2010	6:45p	Tue	3/16/2010	7:15p	BAMP	0.5
Carmel High School	Wed	3/17/2010	4:45a	Wed	3/17/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	3/17/2010	6:46p	Wed	3/17/2010	7:15p	BAMP	0.48
Carmel High School	Thu	3/18/2010	6:47p	Thu	3/18/2010	7:15p	BAMP	0.47
Carmel High School	Fri	3/19/2010	4:45a	Fri	3/19/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	3/19/2010	6:48p	Fri	3/19/2010	7:15p	BAMP	0.45
Carmel High School	Mon	3/22/2010	4:45a	Mon	3/22/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	3/22/2010	6:51p	Mon	3/22/2010	7:15p	BAMP	0.4
Carmel High School	Tue	3/23/2010	6:52p	Tue	3/23/2010	7:15p	BAMP	0.38
Carmel High School	Wed	3/24/2010	4:45a	Wed	3/24/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	3/24/2010	6:52p	Wed	3/24/2010	7:15p	BAMP	0.38
Carmel High School	Thu	3/25/2010	6:53p	Thu	3/25/2010	7:15p	BAMP	0.37
Carmel High School	Fri	3/26/2010	4:45a	Fri	3/26/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	3/26/2010	6:54p	Fri	3/26/2010	7:15p	BAMP	0.35
Carmel High School	Mon	3/29/2010	4:45a	Mon	3/29/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	3/29/2010	6:57p	Mon	3/29/2010	7:15p	BAMP	0.3
Carmel High School	Tue	3/30/2010	6:58p	Tue	3/30/2010	7:15p	BAMP	0.28
Carmel High School	Wed	3/31/2010	4:45a	Wed	3/31/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	3/31/2010	6:59p	Wed	3/31/2010	7:15p	BAMP	0.27
Carmel High School	Thu	4/1/2010	7:00p	Thu	4/1/2010	7:15p	BAMP	0.25
Carmel High School	Fri	4/2/2010	4:45a	Fri	4/2/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	4/2/2010	7:00p	Fri	4/2/2010	7:15p	BAMP	0.25
Carmel High School	Mon	4/5/2010	4:45a	Mon	4/5/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	4/5/2010	7:03p	Mon	4/5/2010	7:15p	BAMP	0.2
Carmel High School	Tue	4/6/2010	7:04p	Tue	4/6/2010	7:15p	BAMP	0.18
Carmel High School	Wed	4/7/2010	4:45a	Wed	4/7/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	4/7/2010	7:05p	Wed	4/7/2010	7:15p	BAMP	0.17
Carmel High School	Thu	4/8/2010	7:06p	Thu	4/8/2010	7:15p	BAMP	0.15
Carmel High School	Fri	4/9/2010	4:45a	Fri	4/9/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	4/9/2010	7:07p	Fri	4/9/2010	7:15p	BAMP	0.13





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Carmel High School	Wed	8/25/2010	4:45a	Wed	8/25/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	8/27/2010	4:45a	Fri	8/27/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	8/30/2010	4:45a	Mon	8/30/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/1/2010	4:45a	Wed	9/1/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	9/3/2010	4:45a	Fri	9/3/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/6/2010	4:45a	Mon	9/6/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/6/2010	6:59p	Mon	9/6/2010	7:15p	BAMP	0.27
Carmel High School	Tue	9/7/2010	6:58p	Tue	9/7/2010	7:15p	BAMP	0.28
Carmel High School	Wed	9/8/2010	4:45a	Wed	9/8/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/8/2010	6:56p	Wed	9/8/2010	7:30p	BAMP	0.57
Carmel High School	Thu	9/9/2010	6:55p	Thu	9/9/2010	7:30p	BAMP	0.58
Carmel High School	Fri	9/10/2010	4:45a	Fri	9/10/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	9/10/2010	6:53p	Fri	9/10/2010	7:30p	BAMP	0.62
Carmel High School	Mon	9/13/2010	4:45a	Mon	9/13/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/13/2010	6:49p	Mon	9/13/2010	7:30p	BAMP	0.68
Carmel High School	Tue	9/14/2010	6:47p	Tue	9/14/2010	7:30p	BAMP	0.72
Carmel High School	Wed	9/15/2010	4:45a	Wed	9/15/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/15/2010	6:46p	Wed	9/15/2010	7:30p	BAMP	0.73
Carmel High School	Thu	9/16/2010	6:44p	Thu	9/16/2010	7:30p	BAMP	0.77
Carmel High School	Fri	9/17/2010	4:45a	Fri	9/17/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	9/17/2010	6:43p	Fri	9/17/2010	7:30p	BAMP	0.78
Carmel High School	Mon	9/20/2010	4:45a	Mon	9/20/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/20/2010	6:38p	Mon	9/20/2010	7:30p	BAMP	0.87
Carmel High School	Tue	9/21/2010	6:37p	Tue	9/21/2010	7:30p	BAMP	0.88
Carmel High School	Wed	9/22/2010	4:45a	Wed	9/22/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/22/2010	6:35p	Wed	9/22/2010	7:30p	BAMP	0.92
Carmel High School	Thu	9/23/2010	6:34p	Thu	9/23/2010	7:30p	BAMP	0.93
Carmel High School	Fri	9/24/2010	4:45a	Fri	9/24/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	9/24/2010	6:32p	Fri	9/24/2010	7:30p	BAMP	0.97
Carmel High School	Mon	9/27/2010	4:45a	Mon	9/27/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/27/2010	6:28p	Mon	9/27/2010	7:30p	BAMP	1.03
Carmel High School	Tue	9/28/2010	6:26p	Tue	9/28/2010	8:30p	BAMP	2.07
Carmel High School	Wed	9/29/2010	4:45a	Wed	9/29/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/29/2010	6:25p	Wed	9/29/2010	7:30p	BAMP	1.08
Carmel High School	Thu	9/30/2010	6:23p	Thu	9/30/2010	7:30p	BAMP	1.12
Carmel High School	Fri	10/1/2010	4:45a	Fri	10/1/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	10/1/2010	6:21p	Fri	10/1/2010	8:30p	BAMP	2.15
Carmel High School	Mon	10/4/2010	4:45a	Mon	10/4/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/4/2010	6:17p	Mon	10/4/2010	7:30p	BAMP	1.22
Carmel High School	Tue	10/5/2010	6:16p	Tue	10/5/2010	7:30p	BAMP	1.23
Carmel High School	Wed	10/6/2010	4:45a	Wed	10/6/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/6/2010	6:14p	Wed	10/6/2010	7:30p	BAMP	1.27
Carmel High School	Thu	10/7/2010	6:13p	Thu	10/7/2010	7:30p	BAMP	1.28
Carmel High School	Fri	10/8/2010	4:45a	Fri	10/8/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	10/8/2010	6:11p	Fri	10/8/2010	7:30p	BAMP	1.32
Carmel High School	Mon	10/11/2010	4:45a	Mon	10/11/2010	7:00a	Adult Masters	2.25
Carmel High School	Tue	10/12/2010	6:05p	Tue	10/12/2010	8:30p	BAMP	2.42
Carmel High School	Wed	10/13/2010	4:45a	Wed	10/13/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	10/15/2010	4:45a	Fri	10/15/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/18/2010	4:45a	Mon	10/18/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/18/2010	5:57p	Mon	10/18/2010	7:30p	BAMP	1.55
Carmel High School	Tue	10/19/2010	5:56p	Tue	10/19/2010	7:30p	BAMP	1.57
Carmel High School	Wed	10/20/2010	4:45a	Wed	10/20/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/20/2010	5:55p	Wed	10/20/2010	7:30p	BAMP	1.58
Carmel High School	Thu	10/21/2010	5:54p	Thu	10/21/2010	7:30p	BAMP	1.6
Carmel High School	Fri	10/22/2010	4:45a	Fri	10/22/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	10/22/2010	5:52p	Fri	10/22/2010	7:30p	BAMP	1.63
Carmel High School	Sat	10/23/2010	5:51p	Sat	10/23/2010	7:00p	Water Polo	1.15

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Carmel High School	Mon	10/25/2010	4:45a	Mon	10/25/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/25/2010	5:49p	Mon	10/25/2010	7:30p	BAMP	1.68
Carmel High School	Tue	10/26/2010	5:47p	Tue	10/26/2010	7:30p	BAMP	1.72
Carmel High School	Wed	10/27/2010	4:45a	Wed	10/27/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/27/2010	5:46p	Wed	10/27/2010	7:30p	BAMP	1.73
Carmel High School	Thu	10/28/2010	5:45p	Thu	10/28/2010	7:30p	BAMP	1.75
Carmel High School	Fri	10/29/2010	4:45a	Fri	10/29/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	10/29/2010	5:44p	Fri	10/29/2010	8:15p	BAMP	2.52
Carmel High School	Sat	10/30/2010	5:43p	Sat	10/30/2010	7:00p	Water Polo	1.28
Carmel High School	Mon	11/1/2010	4:45a	Mon	11/1/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	11/1/2010	5:41p	Mon	11/1/2010	7:30p	BAMP	1.82
Carmel High School	Tue	11/2/2010	5:40p	Tue	11/2/2010	8:15p	BAMP	2.58
Carmel High School	Wed	11/3/2010	4:45a	Wed	11/3/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	11/3/2010	5:39p	Wed	11/3/2010	7:30p	BAMP	1.85
Carmel High School	Thu	11/4/2010	5:38p	Thu	11/4/2010	8:15p	BAMP	2.62
Carmel High School	Fri	11/5/2010	4:45a	Fri	11/5/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	11/5/2010	5:37p	Fri	11/5/2010	7:30p	BAMP	1.88
Carmel High School	Mon	11/8/2010	4:45a	Mon	11/8/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	11/8/2010	4:34p	Mon	11/8/2010	7:30p	BAMP	2.93
Carmel High School	Tue	11/9/2010	4:33p	Tue	11/9/2010	7:30p	BAMP	2.95
Carmel High School	Wed	11/10/2010	4:45a	Wed	11/10/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	11/10/2010	4:32p	Wed	11/10/2010	7:30p	BAMP	2.97
Carmel High School	Thu	11/11/2010	4:31p	Thu	11/11/2010	7:30p	BAMP	2.98
Carmel High School	Fri	11/12/2010	4:45a	Fri	11/12/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	11/12/2010	4:30p	Fri	11/12/2010	7:30p	BAMP	3
Carmel High School	Mon	11/15/2010	4:45a	Mon	11/15/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	11/22/2010	4:45a	Mon	11/22/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	11/24/2010	4:45a	Wed	11/24/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	11/26/2010	4:45a	Fri	11/26/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	11/29/2010	4:45a	Mon	11/29/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	12/15/2010	4:45a	Wed	12/15/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	12/17/2010	4:45a	Fri	12/17/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	12/20/2010	4:45a	Mon	12/20/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	12/22/2010	4:45a	Wed	12/22/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	12/24/2010	4:45a	Fri	12/24/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	12/27/2010	4:45a	Mon	12/27/2010	7:00a	Adult Masters	2.25
Carmel High School	Wed	12/29/2010	4:45a	Wed	12/29/2010	7:00a	Adult Masters	2.25
Carmel High School	Fri	12/31/2010	4:45a	Fri	12/31/2010	7:00a	Adult Masters	2.25
Carmel High School	Mon	1/3/2011	4:45a	Mon	1/3/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	1/5/2011	4:45a	Wed	1/5/2011	7:00a	Adult Masters	2.25
Carmel High School	Thu	1/6/2011	4:35p	Thu	1/6/2011	7:00p	BAMP	2.42
Carmel High School	Fri	1/7/2011	4:45a	Fri	1/7/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	1/7/2011	4:36p	Fri	1/7/2011	7:00p	BAMP	2.4
Carmel High School	Sat	1/8/2011	4:37p	Sat	1/8/2011	7:00p	BAMP	2.38
Carmel High School	Sun	1/9/2011	4:38p	Sun	1/9/2011	7:00p	BAMP	2.37
Carmel High School	Mon	1/10/2011	4:45a	Mon	1/10/2011	7:00a	Adult Masters	2.25
Carmel High School	Mon	1/10/2011	4:39p	Mon	1/10/2011	7:00p	BAMP	2.35
Carmel High School	Tue	1/11/2011	4:40p	Tue	1/11/2011	7:00p	BAMP	2.33
Carmel High School	Wed	1/12/2011	4:45a	Wed	1/12/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	1/12/2011	4:41p	Wed	1/12/2011	7:00p	BAMP	2.32
Carmel High School	Thu	1/13/2011	4:42p	Thu	1/13/2011	7:00p	BAMP	2.3
Carmel High School	Fri	1/14/2011	4:45a	Fri	1/14/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	1/14/2011	4:43p	Fri	1/14/2011	7:00p	BAMP	2.28
Carmel High School	Sat	1/15/2011	4:44p	Sat	1/15/2011	7:00p	BAMP	2.27
Carmel High School	Sun	1/16/2011	4:45p	Sun	1/16/2011	7:00p	BAMP	2.25
Carmel High School	Mon	1/17/2011	4:45a	Mon	1/17/2011	7:00a	Adult Masters	2.25
Carmel High School	Tue	1/18/2011	4:47p	Tue	1/18/2011	7:00p	BAMP	2.22
Carmel High School	Wed	1/19/2011	4:45a	Wed	1/19/2011	7:00a	Adult Masters	2.25

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Carmel High School	Wed	1/19/2011	4:48p	Wed	1/19/2011	7:00p	BAMP	2.2
Carmel High School	Thu	1/20/2011	4:49p	Thu	1/20/2011	7:00p	BAMP	2.18
Carmel High School	Fri	1/21/2011	4:45a	Fri	1/21/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	1/21/2011	4:50p	Fri	1/21/2011	7:00p	BAMP	2.17
Carmel High School	Sat	1/22/2011	4:51p	Sat	1/22/2011	7:00p	BAMP	2.15
Carmel High School	Sun	1/23/2011	4:52p	Sun	1/23/2011	7:00p	BAMP	2.13
Carmel High School	Mon	1/24/2011	4:45a	Mon	1/24/2011	7:00a	Adult Masters	2.25
Carmel High School	Mon	1/24/2011	4:53p	Mon	1/24/2011	7:00p	BAMP	2.12
Carmel High School	Tue	1/25/2011	4:54p	Tue	1/25/2011	7:00p	BAMP	2.1
Carmel High School	Wed	1/26/2011	4:45a	Wed	1/26/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	1/26/2011	4:55p	Wed	1/26/2011	7:00p	BAMP	2.08
Carmel High School	Thu	1/27/2011	4:56p	Thu	1/27/2011	7:00p	BAMP	2.07
Carmel High School	Fri	1/28/2011	4:45a	Fri	1/28/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	1/28/2011	4:57p	Fri	1/28/2011	7:00p	BAMP	2.05
Carmel High School	Sat	1/29/2011	4:59p	Sat	1/29/2011	7:00p	BAMP	2.02
Carmel High School	Sun	1/30/2011	5:00p	Sun	1/30/2011	7:00p	BAMP	2
Carmel High School	Mon	1/31/2011	4:45a	Mon	1/31/2011	7:00a	Adult Masters	2.25
Carmel High School	Mon	1/31/2011	5:01p	Mon	1/31/2011	7:00p	BAMP	1.98
Carmel High School	Tue	2/1/2011	5:02p	Tue	2/1/2011	5:30p		0.47
Carmel High School	Wed	2/2/2011	4:45a	Wed	2/2/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	2/2/2011	5:03p	Wed	2/2/2011	5:30p		0.45
Carmel High School	Thu	2/3/2011	5:04p	Thu	2/3/2011	7:15p		2.18
Carmel High School	Fri	2/4/2011	4:45a	Fri	2/4/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	2/4/2011	5:05p	Fri	2/4/2011	7:15p		2.17
Carmel High School	Mon	2/7/2011	4:45a	Mon	2/7/2011	7:00a	Adult Masters	2.25
Carmel High School	Mon	2/7/2011	5:08p	Mon	2/7/2011	7:15p		2.12
Carmel High School	Tue	2/8/2011	5:09p	Tue	2/8/2011	7:15p		2.1
Carmel High School	Wed	2/9/2011	4:45a	Wed	2/9/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	2/9/2011	5:11p	Wed	2/9/2011	7:15p		2.07
Carmel High School	Thu	2/10/2011	5:12p	Thu	2/10/2011	7:15p		2.05
Carmel High School	Fri	2/11/2011	4:45a	Fri	2/11/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	2/11/2011	5:13p	Fri	2/11/2011	7:15p		2.03
Carmel High School	Mon	2/14/2011	4:45a	Mon	2/14/2011	7:00a	Adult Masters	2.25
Carmel High School	Mon	2/14/2011	5:16p	Mon	2/14/2011	7:15p		1.98
Carmel High School	Tue	2/15/2011	5:17p	Tue	2/15/2011	7:15p		1.97
Carmel High School	Wed	2/16/2011	4:45a	Wed	2/16/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	2/16/2011	5:18p	Wed	2/16/2011	7:15p		1.95
Carmel High School	Thu	2/17/2011	5:19p	Thu	2/17/2011	7:15p		1.93
Carmel High School	Fri	2/18/2011	4:45a	Fri	2/18/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	2/18/2011	5:20p	Fri	2/18/2011	7:15p		1.92
Carmel High School	Mon	2/21/2011	4:45a	Mon	2/21/2011	7:00a	Adult Masters	2.25
Carmel High School	Tue	2/22/2011	5:24p	Tue	2/22/2011	6:15p		0.85
Carmel High School	Wed	2/23/2011	4:45a	Wed	2/23/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	2/23/2011	5:25p	Wed	2/23/2011	6:15p		0.83
Carmel High School	Thu	2/24/2011	5:26p	Thu	2/24/2011	6:15p		0.82
Carmel High School	Fri	2/25/2011	4:45a	Fri	2/25/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	2/25/2011	5:27p	Fri	2/25/2011	6:15p		0.8
Carmel High School	Mon	2/28/2011	4:45a	Mon	2/28/2011	7:00a	Adult Masters	2.25
Carmel High School	Mon	2/28/2011	5:30p	Mon	2/28/2011	7:15p		1.75
Carmel High School	Tue	3/1/2011	5:31p	Tue	3/1/2011	7:15p		1.73
Carmel High School	Wed	3/2/2011	4:45a	Wed	3/2/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	3/2/2011	5:32p	Wed	3/2/2011	7:15p		1.72
Carmel High School	Thu	3/3/2011	5:33p	Thu	3/3/2011	7:15p		1.7
Carmel High School	Fri	3/4/2011	4:45a	Fri	3/4/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	3/4/2011	5:34p	Fri	3/4/2011	7:15p		1.68
Carmel High School	Mon	3/7/2011	4:45a	Mon	3/7/2011	7:00a	Adult Masters	2.25
Carmel High School	Mon	3/7/2011	5:37p	Mon	3/7/2011	7:15p		1.63
Carmel High School	Tue	3/8/2011	5:38p	Tue	3/8/2011	7:15p		1.62

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Carmel High School	Wed	3/9/2011	4:45a	Wed	3/9/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	3/9/2011	5:39p	Wed	3/9/2011	7:15p		1.6
Carmel High School	Thu	3/10/2011	5:40p	Thu	3/10/2011	7:15p		1.58
Carmel High School	Fri	3/11/2011	4:45a	Fri	3/11/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	3/11/2011	5:40p	Fri	3/11/2011	7:15p		1.58
Carmel High School	Mon	3/14/2011	4:45a	Mon	3/14/2011	7:00a	Adult Masters	2.25
Carmel High School	Mon	3/14/2011	6:43p	Mon	3/14/2011	7:15p		0.53
Carmel High School	Tue	3/15/2011	6:44p	Tue	3/15/2011	7:15p		0.52
Carmel High School	Wed	3/16/2011	4:45a	Wed	3/16/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	3/16/2011	6:45p	Wed	3/16/2011	7:15p		0.5
Carmel High School	Thu	3/17/2011	6:46p	Thu	3/17/2011	7:15p		0.48
Carmel High School	Fri	3/18/2011	4:45a	Fri	3/18/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	3/18/2011	6:47p	Fri	3/18/2011	7:15p		0.47
Carmel High School	Mon	3/21/2011	4:45a	Mon	3/21/2011	7:00a	Adult Masters	2.25
Carmel High School	Mon	3/21/2011	6:50p	Mon	3/21/2011	7:15p		0.42
Carmel High School	Tue	3/22/2011	6:50p	Tue	3/22/2011	7:15p		0.42
Carmel High School	Wed	3/23/2011	4:45a	Wed	3/23/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	3/23/2011	6:51p	Wed	3/23/2011	7:15p		0.4
Carmel High School	Thu	3/24/2011	6:52p	Thu	3/24/2011	7:15p		0.38
Carmel High School	Fri	3/25/2011	4:45a	Fri	3/25/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	3/25/2011	6:53p	Fri	3/25/2011	7:15p		0.37
Carmel High School	Mon	3/28/2011	4:45a	Mon	3/28/2011	7:00a	Adult Masters	2.25
Carmel High School	Mon	3/28/2011	6:56p	Mon	3/28/2011	7:15p		0.32
Carmel High School	Tue	3/29/2011	6:57p	Tue	3/29/2011	7:15p		0.3
Carmel High School	Wed	3/30/2011	4:45a	Wed	3/30/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	3/30/2011	6:58p	Wed	3/30/2011	7:15p		0.28
Carmel High School	Thu	3/31/2011	6:58p	Thu	3/31/2011	7:15p		0.28
Carmel High School	Fri	4/1/2011	4:45a	Fri	4/1/2011	7:00a	Adult Masters	2.25
Carmel High School	Mon	4/4/2011	4:45a	Mon	4/4/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	4/6/2011	4:45a	Wed	4/6/2011	7:00a	Adult Masters	2.25
Carmel High School	Fri	4/8/2011	4:45a	Fri	4/8/2011	7:00a	Adult Masters	2.25
Carmel High School	Mon	4/11/2011	4:45a	Mon	4/11/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	4/13/2011	4:45a	Wed	4/13/2011	6:55a	Adult Masters	2.17
Carmel High School	Fri	4/15/2011	4:45a	Fri	4/15/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	4/18/2011	4:45a	Mon	4/18/2011	6:55a	Adult Masters	2.17
Carmel High School	Wed	4/20/2011	4:45a	Wed	4/20/2011	6:55a	Adult Masters	2.17
Carmel High School	Fri	4/22/2011	4:45a	Fri	4/22/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	4/25/2011	4:45a	Mon	4/25/2011	6:55a	Adult Masters	2.17
Carmel High School	Wed	4/27/2011	4:45a	Wed	4/27/2011	6:55a	Adult Masters	2.17
Carmel High School	Fri	4/29/2011	4:45a	Fri	4/29/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	5/2/2011	4:45a	Mon	5/2/2011	6:55a	Adult Masters	2.17
Carmel High School	Wed	5/4/2011	4:45a	Wed	5/4/2011	6:55a	Adult Masters	2.17
Carmel High School	Fri	5/6/2011	4:45a	Fri	5/6/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	5/9/2011	4:45a	Mon	5/9/2011	6:55a	Adult Masters	2.17
Carmel High School	Wed	5/11/2011	4:45a	Wed	5/11/2011	6:55a	Adult Masters	2.17
Carmel High School	Fri	5/13/2011	4:45a	Fri	5/13/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	5/16/2011	4:45a	Mon	5/16/2011	6:55a	Adult Masters	2.17
Carmel High School	Wed	5/18/2011	4:45a	Wed	5/18/2011	6:55a	Adult Masters	2.17
Carmel High School	Fri	5/20/2011	4:45a	Fri	5/20/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	5/23/2011	4:45a	Mon	5/23/2011	6:55a	Adult Masters	2.17
Carmel High School	Wed	5/25/2011	4:45a	Wed	5/25/2011	6:55a	Adult Masters	2.17
Carmel High School	Fri	5/27/2011	4:45a	Fri	5/27/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	5/30/2011	4:45a	Mon	5/30/2011	6:55a	Adult Masters	2.17
Carmel High School	Wed	6/1/2011	4:45a	Wed	6/1/2011	6:55a	Adult Masters	2.17
Carmel High School	Fri	6/3/2011	4:45a	Fri	6/3/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	6/6/2011	4:45a	Mon	6/6/2011	6:55a	Adult Masters	2.17
Carmel High School	Wed	6/8/2011	4:45a	Wed	6/8/2011	6:55a	Adult Masters	2.17
Carmel High School	Fri	6/10/2011	4:45a	Fri	6/10/2011	6:55a	Adult Masters	2.17



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Carmel High School	Mon	6/13/2011	4:45a	Mon	6/13/2011	6:55a	Adult Masters	2.17
Carmel High School	Tue	6/14/2011	4:45a	Tue	6/14/2011	5:47a	Adult Masters	1.03
Carmel High School	Wed	6/15/2011	4:45a	Wed	6/15/2011	6:55a	Adult Masters	2.17
Carmel High School	Thu	6/16/2011	4:45a	Thu	6/16/2011	5:47a	Adult Masters	1.03
Carmel High School	Fri	6/17/2011	4:45a	Fri	6/17/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	6/20/2011	4:45a	Mon	6/20/2011	6:55a	Adult Masters	2.17
Carmel High School	Tue	6/21/2011	4:45a	Tue	6/21/2011	5:48a	Adult Masters	1.05
Carmel High School	Wed	6/22/2011	4:45a	Wed	6/22/2011	6:55a	Adult Masters	2.17
Carmel High School	Thu	6/23/2011	4:45a	Thu	6/23/2011	5:49a	Adult Masters	1.07
Carmel High School	Fri	6/24/2011	4:45a	Fri	6/24/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	6/27/2011	4:45a	Mon	6/27/2011	6:55a	Adult Masters	2.17
Carmel High School	Tue	6/28/2011	4:45a	Tue	6/28/2011	5:50a	Adult Masters	1.08
Carmel High School	Wed	6/29/2011	4:45a	Wed	6/29/2011	6:55a	Adult Masters	2.17
Carmel High School	Thu	6/30/2011	4:45a	Thu	6/30/2011	5:51a	Adult Masters	1.1
Carmel High School	Fri	7/1/2011	4:45a	Fri	7/1/2011	6:55a	Adult Masters	2.17
Carmel High School	Tue	7/5/2011	4:45a	Tue	7/5/2011	5:53a	Adult Masters	1.13
Carmel High School	Wed	7/6/2011	4:45a	Wed	7/6/2011	6:55a	Adult Masters	2.17
Carmel High School	Thu	7/7/2011	4:45a	Thu	7/7/2011	5:55a	Adult Masters	1.17
Carmel High School	Fri	7/8/2011	4:45a	Fri	7/8/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	7/11/2011	4:45a	Mon	7/11/2011	6:55a	Adult Masters	2.17
Carmel High School	Tue	7/12/2011	4:45a	Tue	7/12/2011	5:58a	Adult Masters	1.22
Carmel High School	Wed	7/13/2011	4:45a	Wed	7/13/2011	6:55a	Adult Masters	2.17
Carmel High School	Thu	7/14/2011	4:45a	Thu	7/14/2011	5:59a	Adult Masters	1.23
Carmel High School	Fri	7/15/2011	4:45a	Fri	7/15/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	7/18/2011	4:45a	Mon	7/18/2011	6:55a	Adult Masters	2.17
Carmel High School	Tue	7/19/2011	4:45a	Tue	7/19/2011	6:02a	Adult Masters	1.28
Carmel High School	Wed	7/20/2011	4:45a	Wed	7/20/2011	6:55a	Adult Masters	2.17
Carmel High School	Thu	7/21/2011	4:45a	Thu	7/21/2011	6:04a	Adult Masters	1.32
Carmel High School	Fri	7/22/2011	4:45a	Fri	7/22/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	7/25/2011	4:45a	Mon	7/25/2011	6:55a	Adult Masters	2.17
Carmel High School	Tue	7/26/2011	4:45a	Tue	7/26/2011	6:08a	Adult Masters	1.38
Carmel High School	Wed	7/27/2011	4:45a	Wed	7/27/2011	6:55a	Adult Masters	2.17
Carmel High School	Thu	7/28/2011	4:45a	Thu	7/28/2011	6:09a	Adult Masters	1.4
Carmel High School	Fri	7/29/2011	4:45a	Fri	7/29/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	8/1/2011	4:45a	Mon	8/1/2011	6:55a	Adult Masters	2.17
Carmel High School	Tue	8/2/2011	4:45a	Tue	8/2/2011	6:13a	Adult Masters	1.47
Carmel High School	Wed	8/3/2011	4:45a	Wed	8/3/2011	6:55a	Adult Masters	2.17
Carmel High School	Thu	8/4/2011	4:45a	Thu	8/4/2011	6:15a	Adult Masters	1.5
Carmel High School	Fri	8/5/2011	4:45a	Fri	8/5/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	8/8/2011	4:45a	Mon	8/8/2011	6:55a	Adult Masters	2.17
Carmel High School	Wed	8/10/2011	4:45a	Wed	8/10/2011	6:55a	Adult Masters	2.17
Carmel High School	Fri	8/12/2011	4:45a	Fri	8/12/2011	6:55a	Adult Masters	2.17
Carmel High School	Mon	8/15/2011	4:45a	Mon	8/15/2011	6:55a	Adult Masters	2.17
Carmel High School	Wed	8/17/2011	4:45a	Wed	8/17/2011	6:55a	Adult Masters	2.17
Carmel High School	Fri	8/19/2011	4:45a	Fri	8/19/2011	6:55a	Adult Masters	2.17
Carmel High School	Fri	8/19/2011	7:25p	Fri	8/19/2011	8:15p		0.83
Carmel High School	Mon	8/22/2011	4:45a	Mon	8/22/2011	6:55a	Adult Masters	2.17
Carmel High School	Wed	8/24/2011	4:45a	Wed	8/24/2011	6:55a	Adult Masters	2.17
Carmel High School	Wed	8/24/2011	7:18p	Wed	8/24/2011	8:00p	Water Polo	0.7
Carmel High School	Thu	8/25/2011	7:17p	Thu	8/25/2011	7:30p	Water Polo	0.22
Carmel High School	Fri	8/26/2011	4:45a	Fri	8/26/2011	6:33a	Adult Masters	1.8
Carmel High School	Fri	8/26/2011	7:16p	Fri	8/26/2011	8:00p	Water Polo	0.73
Carmel High School	Mon	8/29/2011	4:45a	Mon	8/29/2011	6:36a	Adult Masters	1.85
Carmel High School	Mon	8/29/2011	7:11p	Mon	8/29/2011	8:00p	Water Polo	0.82
Carmel High School	Tue	8/30/2011	7:10p	Tue	8/30/2011	8:00p	Water Polo	0.83
Carmel High School	Wed	8/31/2011	4:45a	Wed	8/31/2011	6:37a	Adult Masters	1.87
Carmel High School	Wed	8/31/2011	7:09p	Wed	8/31/2011	8:00p	Water Polo	0.85
Carmel High School	Thu	9/1/2011	7:07p	Thu	9/1/2011	8:00p	Water Polo	0.88

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Carmel High School	Fri	9/2/2011	4:45a	Fri	9/2/2011	6:39a	Adult Masters	1.9
Carmel High School	Fri	9/2/2011	7:06p	Fri	9/2/2011	8:30p	Water Polo	1.4
Carmel High School	Mon	9/5/2011	4:45a	Mon	9/5/2011	6:41a	Adult Masters	1.93
Carmel High School	Wed	9/7/2011	4:45a	Wed	9/7/2011	6:43a	Adult Masters	1.97
Carmel High School	Wed	9/7/2011	6:58p	Wed	9/7/2011	8:00p	Water Polo	1.03
Carmel High School	Thu	9/8/2011	6:57p	Thu	9/8/2011	9:00p	Water Polo	2.05
Carmel High School	Fri	9/9/2011	4:45a	Fri	9/9/2011	6:45a	Adult Masters	2
Carmel High School	Fri	9/9/2011	6:55p	Fri	9/9/2011	8:00p	Water Polo	1.08
Carmel High School	Mon	9/12/2011	4:45a	Mon	9/12/2011	6:47a	Adult Masters	2.03
Carmel High School	Mon	9/12/2011	6:51p	Mon	9/12/2011	8:00p	Water Polo	1.15
Carmel High School	Tue	9/13/2011	6:49p	Tue	9/13/2011	9:00p	Water Polo	2.18
Carmel High School	Wed	9/14/2011	4:45a	Wed	9/14/2011	6:49a	Adult Masters	2.07
Carmel High School	Wed	9/14/2011	6:48p	Wed	9/14/2011	8:00p	Water Polo	1.2
Carmel High School	Thu	9/15/2011	6:46p	Thu	9/15/2011	8:00p	Water Polo	1.23
Carmel High School	Fri	9/16/2011	4:45a	Fri	9/16/2011	6:50a	Adult Masters	2.08
Carmel High School	Fri	9/16/2011	6:45p	Fri	9/16/2011	8:00p	Water Polo	1.25
Carmel High School	Mon	9/19/2011	4:45a	Mon	9/19/2011	6:53a	Adult Masters	2.13
Carmel High School	Mon	9/19/2011	6:40p	Mon	9/19/2011	8:00p	Water Polo	1.33
Carmel High School	Tue	9/20/2011	6:39p	Tue	9/20/2011	8:00p	Water Polo	1.35
Carmel High School	Wed	9/21/2011	4:45a	Wed	9/21/2011	6:54a	Adult Masters	2.15
Carmel High School	Wed	9/21/2011	6:37p	Wed	9/21/2011	8:00p	Water Polo	1.38
Carmel High School	Thu	9/22/2011	6:36p	Thu	9/22/2011	8:00p	Water Polo	1.4
Carmel High School	Fri	9/23/2011	4:45a	Fri	9/23/2011	6:56a	Adult Masters	2.18
Carmel High School	Fri	9/23/2011	6:34p	Fri	9/23/2011	8:00p	Water Polo	1.43
Carmel High School	Mon	9/26/2011	4:45a	Mon	9/26/2011	6:58a	Adult Masters	2.22
Carmel High School	Mon	9/26/2011	6:29p	Mon	9/26/2011	8:00p	Water Polo	1.52
Carmel High School	Tue	9/27/2011	6:28p	Tue	9/27/2011	8:30p	Water Polo	2.03
Carmel High School	Wed	9/28/2011	4:45a	Wed	9/28/2011	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/28/2011	6:26p	Wed	9/28/2011	8:00p	Water Polo	1.57
Carmel High School	Thu	9/29/2011	6:25p	Thu	9/29/2011	7:30p	Water Polo	1.08
Carmel High School	Fri	9/30/2011	4:45a	Fri	9/30/2011	7:02a	Adult Masters	2.28
Carmel High School	Fri	9/30/2011	6:23p	Fri	9/30/2011	8:00p	Water Polo	1.62
Carmel High School	Mon	10/3/2011	4:45a	Mon	10/3/2011	7:04a	Adult Masters	2.32
Carmel High School	Mon	10/3/2011	6:19p	Mon	10/3/2011	8:00p	Water Polo	1.68
Carmel High School	Tue	10/4/2011	6:17p	Tue	10/4/2011	8:30p	Water Polo	2.22
Carmel High School	Wed	10/5/2011	4:45a	Wed	10/5/2011	7:06a	Adult Masters	2.35
Carmel High School	Wed	10/5/2011	6:16p	Wed	10/5/2011	9:00p	Water Polo	2.73
Carmel High School	Thu	10/6/2011	6:15p	Thu	10/6/2011	8:00p	Water Polo	1.75
Carmel High School	Fri	10/7/2011	4:45a	Fri	10/7/2011	7:08a	Adult Masters	2.38
Carmel High School	Fri	10/7/2011	6:13p	Fri	10/7/2011	8:00p	Water Polo	1.78
Carmel High School	Mon	10/10/2011	4:45a	Mon	10/10/2011	7:10a	Adult Masters	2.42
Carmel High School	Mon	10/10/2011	6:09p	Mon	10/10/2011	8:00p	Water Polo	1.85
Carmel High School	Wed	10/12/2011	4:45a	Wed	10/12/2011	7:12a	Adult Masters	2.45
Carmel High School	Wed	10/12/2011	6:06p	Wed	10/12/2011	8:00p	Water Polo	1.9
Carmel High School	Thu	10/13/2011	6:05p	Thu	10/13/2011	8:00p	Water Polo	1.92
Carmel High School	Fri	10/14/2011	4:45a	Fri	10/14/2011	7:14a	Adult Masters	2.48
Carmel High School	Fri	10/14/2011	6:03p	Fri	10/14/2011	8:00p	Water Polo	1.95
Carmel High School	Mon	10/17/2011	4:45a	Mon	10/17/2011	7:17a	Adult Masters	2.53
Carmel High School	Mon	10/17/2011	5:59p	Mon	10/17/2011	8:00p	Water Polo	2.02
Carmel High School	Wed	10/19/2011	4:45a	Wed	10/19/2011	7:19a	Adult Masters	2.57
Carmel High School	Wed	10/19/2011	5:56p	Wed	10/19/2011	8:00p	Water Polo	2.07
Carmel High School	Thu	10/20/2011	5:55p	Thu	10/20/2011	8:00p	Water Polo	2.08
Carmel High School	Fri	10/21/2011	4:45a	Fri	10/21/2011	7:21a	Adult Masters	2.6
Carmel High School	Fri	10/21/2011	5:54p	Fri	10/21/2011	8:00p	Water Polo	2.1
Carmel High School	Sat	10/22/2011	5:53p	Sat	10/22/2011	7:00p		1.12
Carmel High School	Mon	10/24/2011	4:45a	Mon	10/24/2011	7:23a	Adult Masters	2.63
Carmel High School	Mon	10/24/2011	5:50p	Mon	10/24/2011	8:00p	Water Polo	2.17
Carmel High School	Wed	10/26/2011	4:45a	Wed	10/26/2011	7:25a	Adult Masters	2.67



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Carmel High School	Wed	10/26/2011	5:48p	Wed	10/26/2011	8:00p	Water Polo	2.2
Carmel High School	Thu	10/27/2011	5:46p	Thu	10/27/2011	7:30p	Water Polo	1.73
Carmel High School	Fri	10/28/2011	4:45a	Fri	10/28/2011	7:27a	Adult Masters	2.7
Carmel High School	Fri	10/28/2011	5:45p	Fri	10/28/2011	8:00p	Water Polo	2.25
Carmel High School	Sat	10/29/2011	5:44p	Sat	10/29/2011	7:00p		1.27
Carmel High School	Mon	10/31/2011	4:45a	Mon	10/31/2011	7:30a	Adult Masters	2.75
Carmel High School	Wed	11/2/2011	4:45a	Wed	11/2/2011	7:32a	Adult Masters	2.78
Carmel High School	Wed	11/2/2011	5:40p	Wed	11/2/2011	6:30p	Water Polo	0.83
Carmel High School	Fri	11/4/2011	4:45a	Fri	11/4/2011	7:34a	Adult Masters	2.82
Carmel High School	Fri	11/4/2011	5:38p	Fri	11/4/2011	6:30p	Water Polo	0.87
Carmel High School	Sat	11/5/2011	5:37p	Sat	11/5/2011	7:00p	Water Polo	1.38
Carmel High School	Mon	11/7/2011	4:45a	Mon	11/7/2011	6:37a	Adult Masters	1.87
Carmel High School	Tue	11/8/2011	4:34p	Tue	11/8/2011	9:00p	Water Polo	4.43
Carmel High School	Wed	11/9/2011	4:45a	Wed	11/9/2011	6:40a	Adult Masters	1.92
Carmel High School	Wed	11/9/2011	4:33p	Wed	11/9/2011	7:30p	Water Polo	2.95
Carmel High School	Thu	11/10/2011	4:32p	Thu	11/10/2011	7:30p	Water Polo	2.97
Carmel High School	Fri	11/11/2011	4:45a	Fri	11/11/2011	6:42a	Adult Masters	1.95
Carmel High School	Mon	11/14/2011	4:45a	Mon	11/14/2011	6:45a	Adult Masters	2
Carmel High School	Wed	11/16/2011	4:45a	Wed	11/16/2011	6:47a	Adult Masters	2.03
Carmel High School	Fri	11/18/2011	4:45a	Fri	11/18/2011	6:49a	Adult Masters	2.07
Carmel High School	Mon	11/21/2011	4:45a	Mon	11/21/2011	6:52a	Adult Masters	2.12
Carmel High School	Wed	11/23/2011	4:45a	Wed	11/23/2011	6:54a	Adult Masters	2.15
Carmel High School	Fri	11/25/2011	4:45a	Fri	11/25/2011	6:56a	Adult Masters	2.18
Carmel High School	Mon	11/28/2011	4:45a	Mon	11/28/2011	6:59a	Adult Masters	2.23
Carmel High School	Wed	11/30/2011	4:45a	Wed	11/30/2011	7:01a	Adult Masters	2.27
Carmel High School	Fri	12/2/2011	4:45a	Fri	12/2/2011	7:03a	Adult Masters	2.3
Carmel High School	Mon	12/5/2011	4:45a	Mon	12/5/2011	7:05a	Adult Masters	2.33
Carmel High School	Wed	12/7/2011	4:45a	Wed	12/7/2011	7:07a	Adult Masters	2.37
Carmel High School	Fri	12/9/2011	4:45a	Fri	12/9/2011	7:09a	Adult Masters	2.4
Carmel High School	Mon	12/12/2011	4:45a	Mon	12/12/2011	7:11a	Adult Masters	2.43
Carmel High School	Wed	12/14/2011	4:45a	Wed	12/14/2011	7:13a	Adult Masters	2.47
Carmel High School	Fri	12/16/2011	4:45a	Fri	12/16/2011	7:14a	Adult Masters	2.48
Carmel High School	Mon	12/19/2011	4:45a	Mon	12/19/2011	7:16a	Adult Masters	2.52
Carmel High School	Mon	12/26/2011	4:45a	Mon	12/26/2011	7:19a	Adult Masters	2.57
Carmel High School	Wed	12/28/2011	4:45a	Wed	12/28/2011	7:20a	Adult Masters	2.58
Carmel High School	Fri	12/30/2011	4:45a	Fri	12/30/2011	7:20a	Adult Masters	2.58
Carmel High School	Mon	1/2/2012	4:45a	Mon	1/2/2012	7:21a	Adult Masters	2.6
Carmel High School	Wed	1/4/2012	4:45a	Wed	1/4/2012	7:21a	Adult Masters	2.6
Carmel High School	Fri	1/6/2012	4:45a	Fri	1/6/2012	7:21a	Adult Masters	2.6
Carmel High School	Mon	1/9/2012	4:45a	Mon	1/9/2012	7:21a	Adult Masters	2.6
Carmel High School	Wed	1/11/2012	4:45a	Wed	1/11/2012	7:21a	Adult Masters	2.6
Carmel High School	Thu	1/12/2012	4:41p	Thu	1/12/2012	7:00p	Diving	2.32
Carmel High School	Fri	1/13/2012	4:45a	Fri	1/13/2012	7:20a	Adult Masters	2.58
Carmel High School	Mon	1/16/2012	4:45a	Mon	1/16/2012	7:20a	Adult Masters	2.58
Carmel High School	Tue	1/17/2012	4:46p	Tue	1/17/2012	7:00p	Diving	2.23
Carmel High School	Wed	1/18/2012	4:45a	Wed	1/18/2012	7:19a	Adult Masters	2.57
Carmel High School	Thu	1/19/2012	4:48p	Thu	1/19/2012	7:00p	Diving	2.2
Carmel High School	Fri	1/20/2012	4:45a	Fri	1/20/2012	7:18a	Adult Masters	2.55
Carmel High School	Mon	1/23/2012	4:45a	Mon	1/23/2012	7:17a	Adult Masters	2.53
Carmel High School	Tue	1/24/2012	4:53p	Tue	1/24/2012	7:00p	Diving	2.12
Carmel High School	Wed	1/25/2012	4:45a	Wed	1/25/2012	7:15a	Adult Masters	2.5
Carmel High School	Thu	1/26/2012	4:55p	Thu	1/26/2012	7:00p	Diving	2.08
Carmel High School	Fri	1/27/2012	4:45a	Fri	1/27/2012	7:14a	Adult Masters	2.48
Carmel High School	Mon	1/30/2012	4:45a	Mon	1/30/2012	7:12a	Adult Masters	2.45
Carmel High School	Tue	1/31/2012	5:00p	Tue	1/31/2012	7:00p	Diving	2
Carmel High School	Wed	2/1/2012	4:45a	Wed	2/1/2012	7:10a	Adult Masters	2.42
Carmel High School	Fri	2/3/2012	4:45a	Fri	2/3/2012	7:09a	Adult Masters	2.4
Carmel High School	Mon	2/6/2012	4:45a	Mon	2/6/2012	7:06a	Adult Masters	2.35

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Carmel High School	Wed	2/8/2012	4:45a	Wed	2/8/2012	7:04a	Adult Masters	2.32
Carmel High School	Fri	2/10/2012	4:45a	Fri	2/10/2012	7:02a	Adult Masters	2.28
Carmel High School	Mon	2/13/2012	4:45a	Mon	2/13/2012	6:59a	Adult Masters	2.23
Carmel High School	Wed	2/15/2012	4:45a	Wed	2/15/2012	6:57a	Adult Masters	2.2
Carmel High School	Fri	2/17/2012	4:45a	Fri	2/17/2012	6:54a	Adult Masters	2.15
Carmel High School	Mon	2/20/2012	4:45a	Mon	2/20/2012	6:51a	Adult Masters	2.1
Carmel High School	Wed	2/22/2012	4:45a	Wed	2/22/2012	6:48a	Adult Masters	2.05
Carmel High School	Fri	2/24/2012	4:45a	Fri	2/24/2012	6:46a	Adult Masters	2.02
Carmel High School	Mon	2/27/2012	4:45a	Mon	2/27/2012	6:42a	Adult Masters	1.95
Carmel High School	Wed	2/29/2012	4:45a	Wed	2/29/2012	6:39a	Adult Masters	1.9
Carmel High School	Fri	3/2/2012	4:45a	Fri	3/2/2012	6:36a	Adult Masters	1.85
Carmel High School	Mon	3/5/2012	4:45a	Mon	3/5/2012	6:32a	Adult Masters	1.78
Carmel High School	Wed	3/7/2012	4:45a	Wed	3/7/2012	6:29a	Adult Masters	1.73
Carmel High School	Fri	3/9/2012	4:45a	Fri	3/9/2012	6:27a	Adult Masters	1.7
Carmel High School	Mon	3/12/2012	4:45a	Mon	3/12/2012	7:22a	Adult Masters	2.62
Carmel High School	Wed	3/14/2012	4:45a	Wed	3/14/2012	7:19a	Adult Masters	2.57
Carmel High School	Fri	3/16/2012	4:45a	Fri	3/16/2012	7:16a	Adult Masters	2.52
Carmel High School	Mon	3/19/2012	4:45a	Mon	3/19/2012	7:12a	Adult Masters	2.45
Carmel High School	Wed	3/21/2012	4:45a	Wed	3/21/2012	7:09a	Adult Masters	2.4
Carmel High School	Fri	3/23/2012	4:45a	Fri	3/23/2012	7:06a	Adult Masters	2.35
Carmel High School	Mon	3/26/2012	4:45a	Mon	3/26/2012	7:01a	Adult Masters	2.27
Carmel High School	Wed	3/28/2012	4:45a	Wed	3/28/2012	6:58a	Adult Masters	2.22
Carmel High School	Fri	3/30/2012	4:45a	Fri	3/30/2012	6:55a	Adult Masters	2.17
Carmel High School	Mon	4/2/2012	4:45a	Mon	4/2/2012	6:51a	Adult Masters	2.1
Carmel High School	Wed	4/4/2012	4:45a	Wed	4/4/2012	6:48a	Adult Masters	2.05
Carmel High School	Fri	4/6/2012	4:45a	Fri	4/6/2012	6:45a	Adult Masters	2
Carmel High School	Mon	4/9/2012	4:45a	Mon	4/9/2012	6:41a	Adult Masters	1.93
Carmel High School	Wed	4/11/2012	4:45a	Wed	4/11/2012	6:38a	Adult Masters	1.88
Carmel High School	Fri	4/13/2012	4:45a	Fri	4/13/2012	6:35a	Adult Masters	1.83
Carmel High School	Mon	4/16/2012	4:45a	Mon	4/16/2012	6:31a	Adult Masters	1.77
Carmel High School	Wed	4/18/2012	4:45a	Wed	4/18/2012	6:29a	Adult Masters	1.73
Carmel High School	Fri	4/20/2012	4:45a	Fri	4/20/2012	6:26a	Adult Masters	1.68
Carmel High School	Mon	4/23/2012	4:45a	Mon	4/23/2012	6:22a	Adult Masters	1.62
Carmel High School	Wed	4/25/2012	4:45a	Wed	4/25/2012	6:20a	Adult Masters	1.58
Carmel High School	Fri	4/27/2012	4:45a	Fri	4/27/2012	6:17a	Adult Masters	1.53
Carmel High School	Mon	4/30/2012	4:45a	Mon	4/30/2012	6:14a	Adult Masters	1.48
Carmel High School	Wed	5/2/2012	4:45a	Wed	5/2/2012	6:11a	Adult Masters	1.43
Carmel High School	Fri	5/4/2012	4:45a	Fri	5/4/2012	6:09a	Adult Masters	1.4
Carmel High School	Mon	5/7/2012	4:45a	Mon	5/7/2012	6:06a	Adult Masters	1.35
Carmel High School	Wed	5/9/2012	4:45a	Wed	5/9/2012	6:04a	Adult Masters	1.32
Carmel High School	Fri	5/11/2012	4:45a	Fri	5/11/2012	6:02a	Adult Masters	1.28
Carmel High School	Mon	5/14/2012	4:45a	Mon	5/14/2012	6:00a	Adult Masters	1.25
Carmel High School	Wed	5/16/2012	4:45a	Wed	5/16/2012	5:58a	Adult Masters	1.22
Carmel High School	Fri	5/18/2012	4:45a	Fri	5/18/2012	5:57a	Adult Masters	1.2
Carmel High School	Mon	5/21/2012	4:45a	Mon	5/21/2012	5:55a	Adult Masters	1.17
Carmel High School	Wed	5/23/2012	4:45a	Wed	5/23/2012	5:53a	Adult Masters	1.13
Carmel High School	Fri	5/25/2012	4:45a	Fri	5/25/2012	5:52a	Adult Masters	1.12
Carmel High School	Mon	5/28/2012	4:45a	Mon	5/28/2012	5:51a	Adult Masters	1.1
Carmel High School	Wed	5/30/2012	4:45a	Wed	5/30/2012	5:50a	Adult Masters	1.08
Carmel High School	Fri	6/1/2012	4:45a	Fri	6/1/2012	5:49a	Adult Masters	1.07
Carmel High School	Mon	6/4/2012	4:45a	Mon	6/4/2012	5:48a	Adult Masters	1.05
Carmel High School	Tue	6/5/2012	4:45a	Tue	6/5/2012	5:48a	Adult Masters	1.05
Carmel High School	Wed	6/6/2012	4:45a	Wed	6/6/2012	5:48a	Adult Masters	1.05
Carmel High School	Thu	6/7/2012	4:45a	Thu	6/7/2012	5:48a	Adult Masters	1.05
Carmel High School	Fri	6/8/2012	4:45a	Fri	6/8/2012	5:48a	Adult Masters	1.05
Carmel High School	Mon	6/11/2012	4:45a	Mon	6/11/2012	5:47a	Adult Masters	1.03
Carmel High School	Tue	6/12/2012	4:45a	Tue	6/12/2012	5:47a	Adult Masters	1.03
Carmel High School	Wed	6/13/2012	4:45a	Wed	6/13/2012	5:47a	Adult Masters	1.03

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Carmel High School	Thu	6/14/2012	4:45a	Thu	6/14/2012	5:47a	Adult Masters	1.03
Carmel High School	Fri	6/15/2012	4:45a	Fri	6/15/2012	5:47a	Adult Masters	1.03
Carmel High School	Mon	6/18/2012	4:45a	Mon	6/18/2012	5:48a	Adult Masters	1.05
Carmel High School	Tue	6/19/2012	4:45a	Tue	6/19/2012	5:48a	Adult Masters	1.05
Carmel High School	Wed	6/20/2012	4:45a	Wed	6/20/2012	5:48a	Adult Masters	1.05
Carmel High School	Thu	6/21/2012	4:45a	Thu	6/21/2012	5:48a	Adult Masters	1.05
Carmel High School	Fri	6/22/2012	4:45a	Fri	6/22/2012	5:49a	Adult Masters	1.07
Carmel High School	Mon	6/25/2012	4:45a	Mon	6/25/2012	5:49a	Adult Masters	1.07
Carmel High School	Tue	6/26/2012	4:45a	Tue	6/26/2012	5:50a	Adult Masters	1.08
Carmel High School	Wed	6/27/2012	4:45a	Wed	6/27/2012	5:50a	Adult Masters	1.08
Carmel High School	Thu	6/28/2012	4:45a	Thu	6/28/2012	5:51a	Adult Masters	1.1
Carmel High School	Fri	6/29/2012	4:45a	Fri	6/29/2012	5:51a	Adult Masters	1.1
Carmel High School	Mon	7/2/2012	4:45a	Mon	7/2/2012	5:52a	Adult Masters	1.12
Carmel High School	Tue	7/3/2012	4:45a	Tue	7/3/2012	5:53a	Adult Masters	1.13
Carmel High School	Thu	7/5/2012	4:45a	Thu	7/5/2012	5:54a	Adult Masters	1.15
Carmel High School	Fri	7/6/2012	4:45a	Fri	7/6/2012	5:54a	Adult Masters	1.15
Carmel High School	Mon	7/9/2012	4:45a	Mon	7/9/2012	5:56a	Adult Masters	1.18
Carmel High School	Tue	7/10/2012	4:45a	Tue	7/10/2012	5:57a	Adult Masters	1.2
Carmel High School	Wed	7/11/2012	4:45a	Wed	7/11/2012	5:57a	Adult Masters	1.2
Carmel High School	Thu	7/12/2012	4:45a	Thu	7/12/2012	5:58a	Adult Masters	1.22
Carmel High School	Fri	7/13/2012	4:45a	Fri	7/13/2012	5:59a	Adult Masters	1.23
Carmel High School	Mon	7/16/2012	4:45a	Mon	7/16/2012	6:01a	Adult Masters	1.27
Carmel High School	Tue	7/17/2012	4:45a	Tue	7/17/2012	6:01a	Adult Masters	1.27
Carmel High School	Mon	7/23/2012	4:45a	Mon	7/23/2012	6:06a	Adult Masters	1.35
Carmel High School	Tue	7/24/2012	7:51p	Tue	7/24/2012	10:00p	Adult Masters	2.15
Carmel High School	Wed	7/25/2012	4:45a	Wed	7/25/2012	6:08a	Adult Masters	1.38
Carmel High School	Thu	7/26/2012	7:50p	Thu	7/26/2012	10:00p	Adult Masters	2.17
Carmel High School	Fri	7/27/2012	4:45a	Fri	7/27/2012	6:09a	Adult Masters	1.4
Carmel High School	Mon	7/30/2012	4:45a	Mon	7/30/2012	6:12a	Adult Masters	1.45
Carmel High School	Tue	7/31/2012	7:45p	Tue	7/31/2012	10:00p	Adult Masters	2.25
Carmel High School	Wed	8/1/2012	4:45a	Wed	8/1/2012	6:13a	Adult Masters	1.47
Carmel High School	Thu	8/2/2012	7:44p	Thu	8/2/2012	10:00p	Adult Masters	2.27
Carmel High School	Fri	8/3/2012	4:45a	Fri	8/3/2012	6:15a	Adult Masters	1.5
Carmel High School	Mon	8/6/2012	4:45a	Mon	8/6/2012	6:17a	Adult Masters	1.53
Carmel High School	Wed	8/8/2012	4:45a	Wed	8/8/2012	6:19a	Adult Masters	1.57
Carmel High School	Fri	8/10/2012	4:45a	Fri	8/10/2012	6:21a	Adult Masters	1.6
Carmel High School	Mon	8/13/2012	4:45a	Mon	8/13/2012	6:23a	Adult Masters	1.63
Carmel High School	Mon	8/13/2012	7:31p	Mon	8/13/2012	7:50p	Water Polo	0.32
Carmel High School	Tue	8/14/2012	7:30p	Tue	8/14/2012	7:50p	Water Polo	0.33
Carmel High School	Wed	8/15/2012	4:45a	Wed	8/15/2012	6:25a	Adult Masters	1.67
Carmel High School	Wed	8/15/2012	7:29p	Wed	8/15/2012	7:50p	Water Polo	0.35
Carmel High School	Thu	8/16/2012	7:28p	Thu	8/16/2012	7:50p	Water Polo	0.37
Carmel High School	Fri	8/17/2012	4:45a	Fri	8/17/2012	6:26a	Adult Masters	1.68
Carmel High School	Fri	8/17/2012	7:27p	Fri	8/17/2012	7:50p	Water Polo	0.38
Carmel High School	Mon	8/20/2012	4:45a	Mon	8/20/2012	6:29a	Adult Masters	1.73
Carmel High School	Mon	8/20/2012	7:23p	Mon	8/20/2012	7:50p	Water Polo	0.45
Carmel High School	Tue	8/21/2012	7:21p	Tue	8/21/2012	7:50p	Water Polo	0.48
Carmel High School	Wed	8/22/2012	4:45a	Wed	8/22/2012	6:31a	Adult Masters	1.77
Carmel High School	Wed	8/22/2012	7:20p	Wed	8/22/2012	7:50p	Water Polo	0.5
Carmel High School	Thu	8/23/2012	7:19p	Thu	8/23/2012	7:50p	Water Polo	0.52
Carmel High School	Fri	8/24/2012	4:45a	Fri	8/24/2012	6:32a	Adult Masters	1.78
Carmel High School	Fri	8/24/2012	7:17p	Fri	8/24/2012	7:50p	Water Polo	0.55
Carmel High School	Mon	8/27/2012	4:45a	Mon	8/27/2012	6:35a	Adult Masters	1.83
Carmel High School	Mon	8/27/2012	7:13p	Mon	8/27/2012	7:50p	Water Polo	0.62
Carmel High School	Tue	8/28/2012	7:12p	Tue	8/28/2012	8:40p	Water Polo	1.47
Carmel High School	Wed	8/29/2012	4:45a	Wed	8/29/2012	7:00a	Adult Masters	2.25
Carmel High School	Wed	8/29/2012	7:10p	Wed	8/29/2012	7:50p	Water Polo	0.67
Carmel High School	Thu	8/30/2012	7:09p	Thu	8/30/2012	8:40p	Water Polo	1.52

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Carmel High School	Fri	8/31/2012	7:07p	Fri	8/31/2012	8:15p	Water Polo	1.13
Carmel High School	Fri	8/31/2012	4:45a	Fri	8/31/2012	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/3/2012	4:45a	Mon	9/3/2012	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/3/2012	7:03p	Mon	9/3/2012	8:10p	Water Polo	1.12
Carmel High School	Tue	9/4/2012	7:02p	Tue	9/4/2012	8:10p	Water Polo	1.13
Carmel High School	Wed	9/5/2012	4:45a	Wed	9/5/2012	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/5/2012	7:00p	Wed	9/5/2012	8:10p	Water Polo	1.17
Carmel High School	Thu	9/6/2012	6:59p	Thu	9/6/2012	8:10p	Water Polo	1.18
Carmel High School	Fri	9/7/2012	4:45a	Fri	9/7/2012	7:00a	Adult Masters	2.25
Carmel High School	Fri	9/7/2012	6:57p	Fri	9/7/2012	8:10p	Water Polo	1.22
Carmel High School	Mon	9/10/2012	4:45a	Mon	9/10/2012	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/10/2012	6:53p	Mon	9/10/2012	8:10p	Water Polo	1.28
Carmel High School	Tue	9/11/2012	6:51p	Tue	9/11/2012	8:10p	Water Polo	1.32
Carmel High School	Wed	9/12/2012	4:45a	Wed	9/12/2012	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/12/2012	6:50p	Wed	9/12/2012	8:10p	Water Polo	1.33
Carmel High School	Thu	9/13/2012	6:48p	Thu	9/13/2012	7:30p	Water Polo	0.7
Carmel High School	Fri	9/14/2012	6:47p	Fri	9/14/2012	9:30p		2.72
Carmel High School	Fri	9/14/2012	4:45a	Fri	9/14/2012	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/17/2012	4:45a	Mon	9/17/2012	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/17/2012	6:42p	Mon	9/17/2012	8:10p	Water Polo	1.47
Carmel High School	Tue	9/18/2012	6:40p	Tue	9/18/2012	8:15p	Water Polo	1.58
Carmel High School	Wed	9/19/2012	4:45a	Wed	9/19/2012	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/19/2012	6:39p	Wed	9/19/2012	8:10p	Water Polo	1.52
Carmel High School	Thu	9/20/2012	6:37p	Thu	9/20/2012	7:30p	Water Polo	0.88
Carmel High School	Fri	9/21/2012	4:45a	Fri	9/21/2012	7:00a	Adult Masters	2.25
Carmel High School	Fri	9/21/2012	6:36p	Fri	9/21/2012	8:10p	Water Polo	1.57
Carmel High School	Sat	9/22/2012	6:34p	Sat	9/22/2012	8:00p	Water Polo	1.43
Carmel High School	Mon	9/24/2012	4:45a	Mon	9/24/2012	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/24/2012	6:31p	Mon	9/24/2012	8:10p	Water Polo	1.65
Carmel High School	Tue	9/25/2012	6:30p	Tue	9/25/2012	7:00p	Water Polo	0.5
Carmel High School	Wed	9/26/2012	4:45a	Wed	9/26/2012	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/26/2012	6:28p	Wed	9/26/2012	8:10p	Water Polo	1.7
Carmel High School	Thu	9/27/2012	6:27p	Thu	9/27/2012	7:30p	Water Polo	1.05
Carmel High School	Fri	9/28/2012	4:45a	Fri	9/28/2012	7:00a	Adult Masters	2.25
Carmel High School	Fri	9/28/2012	6:25p	Fri	9/28/2012	8:10p	Water Polo	1.75
Carmel High School	Mon	10/1/2012	4:45a	Mon	10/1/2012	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/1/2012	6:21p	Mon	10/1/2012	8:10p	Water Polo	1.82
Carmel High School	Tue	10/2/2012	6:19p	Tue	10/2/2012	7:00p	Water Polo	0.68
Carmel High School	Wed	10/3/2012	4:45a	Wed	10/3/2012	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/3/2012	6:18p	Wed	10/3/2012	8:10p	Water Polo	1.87
Carmel High School	Thu	10/4/2012	6:16p	Thu	10/4/2012	8:10p	Water Polo	1.9
Carmel High School	Fri	10/5/2012	4:45a	Fri	10/5/2012	7:00a	Adult Masters	2.25
Carmel High School	Fri	10/5/2012	6:15p	Fri	10/5/2012	8:10p	Water Polo	1.92
Carmel High School	Sat	10/6/2012	6:13p	Sat	10/6/2012	8:00p	Water Polo	1.78
Carmel High School	Mon	10/8/2012	4:45a	Mon	10/8/2012	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/8/2012	6:11p	Mon	10/8/2012	8:10p	Water Polo	1.98
Carmel High School	Tue	10/9/2012	6:09p	Tue	10/9/2012	8:10p	Water Polo	2.02
Carmel High School	Wed	10/10/2012	4:45a	Wed	10/10/2012	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/10/2012	6:08p	Wed	10/10/2012	8:10p	Water Polo	2.03
Carmel High School	Thu	10/11/2012	6:06p	Thu	10/11/2012	8:10p	Water Polo	2.07
Carmel High School	Fri	10/12/2012	4:45a	Fri	10/12/2012	7:00a	Adult Masters	2.25
Carmel High School	Fri	10/12/2012	6:05p	Fri	10/12/2012	8:10p	Water Polo	2.08
Carmel High School	Mon	10/15/2012	4:45a	Mon	10/15/2012	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/15/2012	6:01p	Mon	10/15/2012	8:10p	Water Polo	2.15
Carmel High School	Tue	10/16/2012	5:59p	Tue	10/16/2012	7:00p	Water Polo	1.02
Carmel High School	Wed	10/17/2012	4:45a	Wed	10/17/2012	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/17/2012	5:58p	Wed	10/17/2012	8:10p	Water Polo	2.2
Carmel High School	Thu	10/18/2012	5:57p	Thu	10/18/2012	7:00p	Water Polo	1.05



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Carmel High School	Fri	10/19/2012	4:45a	Fri	10/19/2012	7:00a	Adult Masters	2.25
Carmel High School	Fri	10/19/2012	5:55p	Fri	10/19/2012	8:30p	Water Polo	2.58
Carmel High School	Sat	10/20/2012	5:54p	Sat	10/20/2012	8:30p	Water Polo	2.6
Carmel High School	Mon	10/22/2012	4:45a	Mon	10/22/2012	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/22/2012	5:52p	Mon	10/22/2012	8:10p	Water Polo	2.3
Carmel High School	Tue	10/23/2012	5:50p	Tue	10/23/2012	8:45p	Water Polo	2.92
Carmel High School	Wed	10/24/2012	4:45a	Wed	10/24/2012	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/24/2012	5:49p	Wed	10/24/2012	8:10p	Water Polo	2.35
Carmel High School	Thu	10/25/2012	5:48p	Thu	10/25/2012	8:30p	Water Polo	2.7
Carmel High School	Fri	10/26/2012	5:47p	Fri	10/26/2012	8:30p	Water Polo	2.72
Carmel High School	Fri	10/26/2012	4:45a	Fri	10/26/2012	7:00a	Adult Masters	2.25
Carmel High School	Sat	10/27/2012	5:46p	Sat	10/27/2012	7:45p	Water Polo	1.98
Carmel High School	Mon	10/29/2012	6:34p	Mon	10/29/2012	8:00p		1.43
Carmel High School	Mon	10/29/2012	4:45a	Mon	10/29/2012	7:00a	Adult Masters	2.25
Carmel High School	Tue	10/30/2012	5:42p	Tue	10/30/2012	7:00p	Water Polo	1.3
Carmel High School	Wed	10/31/2012	4:45a	Wed	10/31/2012	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/31/2012	5:41p	Wed	10/31/2012	8:00p	Water Polo	2.32
Carmel High School	Thu	11/1/2012	5:40p	Thu	11/1/2012	8:30p	Water Polo	2.83
Carmel High School	Fri	11/2/2012	4:45a	Fri	11/2/2012	7:00a	Adult Masters	2.25
Carmel High School	Fri	11/2/2012	5:39p	Fri	11/2/2012	8:00p	Water Polo	2.35
Carmel High School	Mon	11/5/2012	4:45a	Mon	11/5/2012	7:00a	Adult Masters	2.25
Carmel High School	Mon	11/5/2012	4:36p	Mon	11/5/2012	8:00p	Water Polo	3.4
Carmel High School	Tue	11/6/2012	4:35p	Tue	11/6/2012	8:00p	Water Polo	3.42
Carmel High School	Wed	11/7/2012	4:34p	Wed	11/7/2012	9:30p	Water Polo	4.93
Carmel High School	Wed	11/7/2012	4:45a	Wed	11/7/2012	7:00a	Adult Masters	2.25
Carmel High School	Thu	11/8/2012	6:07p	Thu	11/8/2012	8:00p		1.88
Carmel High School	Thu	11/8/2012	4:33p	Thu	11/8/2012	6:00p		1.45
Carmel High School	Fri	11/9/2012	4:45a	Fri	11/9/2012	7:00a	Adult Masters	2.25
Carmel High School	Fri	11/9/2012	4:32p	Fri	11/9/2012	8:00p		3.47
Carmel High School	Mon	11/12/2012	4:45a	Mon	11/12/2012	7:00a	Adult Masters	2.25
Carmel High School	Tue	12/18/2012	5:00p	Tue	12/18/2012	7:00p	Legacy WP	2
Carmel High School	Thu	12/20/2012	5:00p	Thu	12/20/2012	7:00p	Legacy WP	2
Carmel High School	Wed	1/2/2013	4:45a	Wed	1/2/2013	7:00a	SAC	2.25
Carmel High School	Thu	1/3/2013	4:45a	Thu	1/3/2013	7:00a	SAC	2.25
Carmel High School	Fri	1/4/2013	4:45a	Fri	1/4/2013	7:00a	SAC	2.25
Carmel High School	Mon	1/7/2013	4:45a	Mon	1/7/2013	7:00a	SAC	2.25
Carmel High School	Mon	1/7/2013	5:30p	Mon	1/7/2013	7:30p	SAC	2
Carmel High School	Tue	1/8/2013	4:45a	Tue	1/8/2013	7:00a	SAC	2.25
Carmel High School	Tue	1/8/2013	5:00p	Tue	1/8/2013	8:00p	Legacy WP	3
Carmel High School	Wed	1/9/2013	4:45a	Wed	1/9/2013	7:00a	SAC	2.25
Carmel High School	Wed	1/9/2013	5:30p	Wed	1/9/2013	7:30p	SAC	2
Carmel High School	Thu	1/10/2013	4:45a	Thu	1/10/2013	7:00a	SAC	2.25
Carmel High School	Thu	1/10/2013	5:00p	Thu	1/10/2013	8:00p	Legacy WP	3
Carmel High School	Fri	1/11/2013	4:45a	Fri	1/11/2013	7:00a	SAC	2.25
Carmel High School	Fri	1/11/2013	5:30p	Fri	1/11/2013	7:30p	SAC	2
Carmel High School	Mon	1/14/2013	4:45a	Mon	1/14/2013	7:00a	SAC	2.25
Carmel High School	Mon	1/14/2013	5:30p	Mon	1/14/2013	7:30p	SAC	2
Carmel High School	Tue	1/15/2013	4:45a	Tue	1/15/2013	7:00a	SAC	2.25
Carmel High School	Tue	1/15/2013	5:00p	Tue	1/15/2013	8:00p	Legacy WP	3
Carmel High School	Wed	1/16/2013	4:45a	Wed	1/16/2013	7:00a	SAC	2.25
Carmel High School	Wed	1/16/2013	5:30p	Wed	1/16/2013	7:30p	SAC	2
Carmel High School	Thu	1/17/2013	4:45a	Thu	1/17/2013	7:00a	SAC	2.25
Carmel High School	Thu	1/17/2013	5:00p	Thu	1/17/2013	8:00p	Legacy WP	3
Carmel High School	Fri	1/18/2013	4:45a	Fri	1/18/2013	7:00a	SAC	2.25
Carmel High School	Fri	1/18/2013	5:30p	Fri	1/18/2013	7:45p	SAC	2.25
Carmel High School	Tue	1/22/2013	4:45a	Tue	1/22/2013	7:17a	SAC	2.53
Carmel High School	Tue	1/22/2013	5:00p	Tue	1/22/2013	8:15p	Legacy WP	3.25
Carmel High School	Wed	1/23/2013	4:45a	Wed	1/23/2013	7:16a	SAC	2.52

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Carmel High School	Wed	1/23/2013	5:30p	Wed	1/23/2013	7:45p	SAC	2.25
Carmel High School	Thu	1/24/2013	4:45a	Thu	1/24/2013	7:16a	SAC	2.52
Carmel High School	Thu	1/24/2013	5:00p	Thu	1/24/2013	8:15p	Legacy WP	3.25
Carmel High School	Fri	1/25/2013	4:45a	Fri	1/25/2013	7:15a	SAC	2.5
Carmel High School	Fri	1/25/2013	5:30p	Fri	1/25/2013	7:45p	SAC	2.25
Carmel High School	Mon	1/28/2013	4:45a	Mon	1/28/2013	7:13a	SAC	2.47
Carmel High School	Mon	1/28/2013	4:58p	Mon	1/28/2013	7:45p	SAC	2.78
Carmel High School	Tue	1/29/2013	4:45a	Tue	1/29/2013	7:12a	SAC	2.45
Carmel High School	Tue	1/29/2013	4:59p	Tue	1/29/2013	7:45p	SAC	2.77
Carmel High School	Wed	1/30/2013	4:45a	Wed	1/30/2013	7:11a	SAC	2.43
Carmel High School	Wed	1/30/2013	5:00p	Wed	1/30/2013	7:45p	SAC	2.75
Carmel High School	Thu	1/31/2013	4:45a	Thu	1/31/2013	7:11a	SAC	2.43
Carmel High School	Thu	1/31/2013	5:01p	Thu	1/31/2013	7:45p	SAC	2.73
Carmel High School	Fri	2/1/2013	4:45a	Fri	2/1/2013	7:10a	SAC	2.42
Carmel High School	Fri	2/1/2013	5:02p	Fri	2/1/2013	7:45p	SAC	2.72
Carmel High School	Mon	2/4/2013	4:45a	Mon	2/4/2013	7:07a	SAC	2.37
Carmel High School	Tue	2/5/2013	4:45a	Tue	2/5/2013	7:06a	SAC	2.35
Carmel High School	Wed	2/6/2013	4:45a	Wed	2/6/2013	7:05a	SAC	2.33
Carmel High School	Thu	2/7/2013	4:45a	Thu	2/7/2013	7:04a	SAC	2.32
Carmel High School	Fri	2/8/2013	4:45a	Fri	2/8/2013	7:03a	SAC	2.3
Carmel High School	Mon	2/11/2013	4:45a	Mon	2/11/2013	7:00a	SAC	2.25
Carmel High School	Tue	2/12/2013	4:45a	Tue	2/12/2013	6:59a	SAC	2.23
Carmel High School	Wed	2/13/2013	4:45a	Wed	2/13/2013	6:58a	SAC	2.22
Carmel High School	Thu	2/14/2013	4:45a	Thu	2/14/2013	6:57a	SAC	2.2
Carmel High School	Fri	2/15/2013	4:45a	Fri	2/15/2013	6:56a	SAC	2.18
Carmel High School	Tue	2/19/2013	4:45a	Tue	2/19/2013	6:51a	SAC	2.1
Carmel High School	Wed	2/20/2013	4:45a	Wed	2/20/2013	6:50a	SAC	2.08
Carmel High School	Thu	2/21/2013	4:45a	Thu	2/21/2013	6:49a	SAC	2.07
Carmel High School	Fri	2/22/2013	4:45a	Fri	2/22/2013	6:47a	SAC	2.03
Carmel High School	Mon	2/25/2013	4:45a	Mon	2/25/2013	6:43a	SAC	1.97
Carmel High School	Tue	2/26/2013	4:45a	Tue	2/26/2013	6:42a	SAC	1.95
Carmel High School	Wed	2/27/2013	4:45a	Wed	2/27/2013	6:41a	SAC	1.93
Carmel High School	Thu	2/28/2013	4:45a	Thu	2/28/2013	6:39a	SAC	1.9
Carmel High School	Fri	3/1/2013	4:45a	Fri	3/1/2013	6:38a	SAC	1.88
Carmel High School	Mon	3/4/2013	4:45a	Mon	3/4/2013	6:34a	SAC	1.82
Carmel High School	Tue	3/5/2013	4:45a	Tue	3/5/2013	6:33a	SAC	1.8
Carmel High School	Tue	3/5/2013	5:35p	Tue	3/5/2013	7:30p	Legacy WP	1.92
Carmel High School	Wed	3/6/2013	5:36p	Wed	3/6/2013	7:00p		1.4
Carmel High School	Wed	3/6/2013	4:45a	Wed	3/6/2013	6:31a	SAC	1.77
Carmel High School	Thu	3/7/2013	5:37p	Thu	3/7/2013	7:45p	Legacy WP	2.13
Carmel High School	Thu	3/7/2013	4:45a	Thu	3/7/2013	6:30a	SAC	1.75
Carmel High School	Fri	3/8/2013	5:38p	Fri	3/8/2013	7:00p		1.37
Carmel High School	Fri	3/8/2013	4:45a	Fri	3/8/2013	6:28a	SAC	1.72
Carmel High School	Mon	3/11/2013	4:45a	Mon	3/11/2013	7:24a	SAC	2.65
Carmel High School	Tue	3/12/2013	6:42p	Tue	3/12/2013	7:45p	Legacy WP	1.05
Carmel High School	Tue	3/12/2013	4:45a	Tue	3/12/2013	7:23a	SAC	2.63
Carmel High School	Wed	3/13/2013	4:45a	Wed	3/13/2013	7:21a	SAC	2.6
Carmel High School	Thu	3/14/2013	6:44p	Thu	3/14/2013	7:45p	Legacy WP	1.02
Carmel High School	Thu	3/14/2013	4:45a	Thu	3/14/2013	7:20a	SAC	2.58
Carmel High School	Fri	3/15/2013	4:45a	Fri	3/15/2013	7:18a	SAC	2.55
Carmel High School	Mon	3/18/2013	4:45a	Mon	3/18/2013	7:14a	SAC	2.48
Carmel High School	Tue	3/19/2013	6:48p	Tue	3/19/2013	7:45p	Legacy WP	0.95
Carmel High School	Tue	3/19/2013	4:45a	Tue	3/19/2013	7:12a	SAC	2.45
Carmel High School	Wed	3/20/2013	4:45a	Wed	3/20/2013	7:11a	SAC	2.43
Carmel High School	Thu	3/21/2013	6:50p	Thu	3/21/2013	7:45p	Legacy WP	0.92
Carmel High School	Thu	3/21/2013	4:45a	Thu	3/21/2013	7:09a	SAC	2.4
Carmel High School	Fri	3/22/2013	4:45a	Fri	3/22/2013	7:08a	SAC	2.38
Carmel High School	Mon	3/25/2013	4:45a	Mon	3/25/2013	7:03a	SAC	2.3



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Carmel High School	Tue	3/26/2013	6:54p	Tue	3/26/2013	7:45p	Legacy WP	0.85
Carmel High School	Tue	3/26/2013	4:45a	Tue	3/26/2013	7:02a	SAC	2.28
Carmel High School	Wed	3/27/2013	4:45a	Wed	3/27/2013	7:00a	SAC	2.25
Carmel High School	Thu	3/28/2013	4:45a	Thu	3/28/2013	6:59a	SAC	2.23
Carmel High School	Fri	3/29/2013	4:45a	Fri	3/29/2013	6:57a	SAC	2.2
Carmel High School	Mon	4/1/2013	4:45a	Mon	4/1/2013	6:53a	SAC	2.13
Carmel High School	Tue	4/2/2013	7:01p	Tue	4/2/2013	7:45p	Legacy WP	0.73
Carmel High School	Tue	4/2/2013	4:45a	Tue	4/2/2013	6:51a	SAC	2.1
Carmel High School	Wed	4/3/2013	4:45a	Wed	4/3/2013	6:50a	SAC	2.08
Carmel High School	Thu	4/4/2013	7:02p	Thu	4/4/2013	7:45p	Legacy WP	0.72
Carmel High School	Thu	4/4/2013	4:45a	Thu	4/4/2013	6:48a	SAC	2.05
Carmel High School	Fri	4/5/2013	4:45a	Fri	4/5/2013	6:47a	SAC	2.03
Carmel High School	Tue	4/9/2013	4:45a	Tue	4/9/2013	6:41a	SAC	1.93
Carmel High School	Wed	4/10/2013	4:45a	Wed	4/10/2013	6:40a	SAC	1.92
Carmel High School	Thu	4/11/2013	4:45a	Thu	4/11/2013	6:38a	SAC	1.88
Carmel High School	Fri	4/12/2013	4:45a	Fri	4/12/2013	6:37a	SAC	1.87
Carmel High School	Mon	4/15/2013	4:45a	Mon	4/15/2013	6:33a	SAC	1.8
Carmel High School	Tue	4/16/2013	7:13p	Tue	4/16/2013	7:45p	Legacy WP	0.53
Carmel High School	Tue	4/16/2013	4:45a	Tue	4/16/2013	6:32a	SAC	1.78
Carmel High School	Wed	4/17/2013	4:45a	Wed	4/17/2013	6:30a	SAC	1.75
Carmel High School	Thu	4/18/2013	7:15p	Thu	4/18/2013	7:45p	Legacy WP	0.5
Carmel High School	Thu	4/18/2013	4:45a	Thu	4/18/2013	6:29a	SAC	1.73
Carmel High School	Fri	4/19/2013	7:16p	Fri	4/19/2013	9:00p		1.73
Carmel High School	Fri	4/19/2013	4:45a	Fri	4/19/2013	6:28a	SAC	1.72
Carmel High School	Mon	4/22/2013	4:45a	Mon	4/22/2013	6:24a	SAC	1.65
Carmel High School	Tue	4/23/2013	4:45a	Tue	4/23/2013	6:22a	SAC	1.62
Carmel High School	Wed	4/24/2013	4:45a	Wed	4/24/2013	6:21a	SAC	1.6
Carmel High School	Thu	4/25/2013	4:45a	Thu	4/25/2013	6:20a	SAC	1.58
Carmel High School	Fri	4/26/2013	4:45a	Fri	4/26/2013	6:19a	SAC	1.57
Carmel High School	Mon	4/29/2013	4:45a	Mon	4/29/2013	6:15a	SAC	1.5
Carmel High School	Tue	4/30/2013	4:45a	Tue	4/30/2013	6:14a	SAC	1.48
Carmel High School	Wed	5/1/2013	4:45a	Wed	5/1/2013	6:13a	SAC	1.47
Carmel High School	Thu	5/2/2013	4:45a	Thu	5/2/2013	6:12a	SAC	1.45
Carmel High School	Fri	5/3/2013	7:28p	Fri	5/3/2013	9:00p	Swim	1.53
Carmel High School	Fri	5/3/2013	4:45a	Fri	5/3/2013	6:11a	SAC	1.43
Carmel High School	Mon	5/6/2013	4:45a	Mon	5/6/2013	6:07a	SAC	1.37
Carmel High School	Tue	5/7/2013	4:45a	Tue	5/7/2013	6:06a	SAC	1.35
Carmel High School	Wed	5/8/2013	4:45a	Wed	5/8/2013	6:05a	SAC	1.33
Carmel High School	Thu	5/9/2013	4:45a	Thu	5/9/2013	6:05a	SAC	1.33
Carmel High School	Fri	5/10/2013	4:45a	Fri	5/10/2013	6:04a	SAC	1.32
Carmel High School	Mon	5/13/2013	4:45a	Mon	5/13/2013	6:01a	SAC	1.27
Carmel High School	Tue	5/14/2013	4:45a	Tue	5/14/2013	6:00a	SAC	1.25
Carmel High School	Wed	5/15/2013	4:45a	Wed	5/15/2013	5:59a	SAC	1.23
Carmel High School	Thu	5/16/2013	4:45a	Thu	5/16/2013	5:58a	SAC	1.22
Carmel High School	Fri	5/17/2013	4:45a	Fri	5/17/2013	5:58a	SAC	1.22
Carmel High School	Mon	5/20/2013	4:45a	Mon	5/20/2013	5:55a	SAC	1.17
Carmel High School	Tue	5/21/2013	4:45a	Tue	5/21/2013	5:55a	SAC	1.17
Carmel High School	Wed	5/22/2013	4:45a	Wed	5/22/2013	5:54a	SAC	1.15
Carmel High School	Thu	5/23/2013	4:45a	Thu	5/23/2013	5:54a	SAC	1.15
Carmel High School	Fri	5/24/2013	4:45a	Fri	5/24/2013	5:53a	SAC	1.13
Carmel High School	Tue	5/28/2013	4:45a	Tue	5/28/2013	5:51a	SAC	1.1
Carmel High School	Wed	5/29/2013	4:45a	Wed	5/29/2013	5:50a	SAC	1.08
Carmel High School	Thu	5/30/2013	4:45a	Thu	5/30/2013	5:50a	SAC	1.08
Carmel High School	Fri	5/31/2013	4:45a	Fri	5/31/2013	5:50a	SAC	1.08
Carmel High School	Mon	6/3/2013	4:45a	Mon	6/3/2013	5:49a	SAC	1.07
Carmel High School	Tue	6/4/2013	4:45a	Tue	6/4/2013	5:48a	SAC	1.05
Carmel High School	Wed	6/5/2013	4:45a	Wed	6/5/2013	5:48a	SAC	1.05
Carmel High School	Thu	6/6/2013	4:45a	Thu	6/6/2013	5:48a	SAC	1.05

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Carmel High School	Fri	6/7/2013	4:45a	Fri	6/7/2013	5:48a	SAC	1.05
Carmel High School	Mon	6/10/2013	4:45a	Mon	6/10/2013	5:47a	SAC	1.03
Carmel High School	Tue	6/11/2013	4:45a	Tue	6/11/2013	5:47a	SAC	1.03
Carmel High School	Wed	6/12/2013	4:45a	Wed	6/12/2013	5:47a	SAC	1.03
Carmel High School	Thu	6/13/2013	4:45a	Thu	6/13/2013	5:47a	SAC	1.03
Carmel High School	Fri	6/14/2013	4:45a	Fri	6/14/2013	5:47a	SAC	1.03
Carmel High School	Mon	6/17/2013	4:45a	Mon	6/17/2013	5:48a	SAC	1.05
Carmel High School	Tue	6/18/2013	4:45a	Tue	6/18/2013	5:48a	SAC	1.05
Carmel High School	Wed	6/19/2013	4:45a	Wed	6/19/2013	5:48a	SAC	1.05
Carmel High School	Thu	6/20/2013	4:45a	Thu	6/20/2013	5:48a	SAC	1.05
Carmel High School	Fri	6/21/2013	4:45a	Fri	6/21/2013	5:48a	SAC	1.05
Carmel High School	Mon	6/24/2013	4:45a	Mon	6/24/2013	5:49a	SAC	1.07
Carmel High School	Tue	6/25/2013	4:45a	Tue	6/25/2013	5:49a	SAC	1.07
Carmel High School	Wed	6/26/2013	4:45a	Wed	6/26/2013	5:50a	SAC	1.08
Carmel High School	Thu	6/27/2013	4:45a	Thu	6/27/2013	5:50a	SAC	1.08
Carmel High School	Fri	6/28/2013	4:45a	Fri	6/28/2013	5:50a	SAC	1.08
Carmel High School	Mon	7/1/2013	4:45a	Mon	7/1/2013	5:52a	SAC	1.12
Carmel High School	Tue	7/2/2013	4:45a	Tue	7/2/2013	5:52a	SAC	1.12
Carmel High School	Wed	7/3/2013	4:45a	Wed	7/3/2013	5:53a	SAC	1.13
Carmel High School	Fri	7/5/2013	4:45a	Fri	7/5/2013	5:54a	SAC	1.15
Carmel High School	Mon	7/8/2013	4:45a	Mon	7/8/2013	5:55a	SAC	1.17
Carmel High School	Tue	7/9/2013	4:45a	Tue	7/9/2013	5:56a	SAC	1.18
Carmel High School	Wed	7/10/2013	4:45a	Wed	7/10/2013	5:57a	SAC	1.2
Carmel High School	Thu	7/11/2013	4:45a	Thu	7/11/2013	5:57a	SAC	1.2
Carmel High School	Fri	7/12/2013	4:45a	Fri	7/12/2013	5:58a	SAC	1.22
Carmel High School	Mon	7/15/2013	4:45a	Mon	7/15/2013	6:00a	SAC	1.25
Carmel High School	Tue	7/16/2013	4:45a	Tue	7/16/2013	6:01a	SAC	1.27
Carmel High School	Wed	7/17/2013	4:45a	Wed	7/17/2013	6:01a	SAC	1.27
Carmel High School	Thu	7/18/2013	4:45a	Thu	7/18/2013	6:02a	SAC	1.28
Carmel High School	Fri	7/19/2013	4:45a	Fri	7/19/2013	6:03a	SAC	1.3
Carmel High School	Mon	7/22/2013	4:45a	Mon	7/22/2013	6:05a	SAC	1.33
Carmel High School	Tue	7/23/2013	4:45a	Tue	7/23/2013	6:06a	SAC	1.35
Carmel High School	Wed	7/24/2013	4:45a	Wed	7/24/2013	6:07a	SAC	1.37
Carmel High School	Thu	7/25/2013	4:45a	Thu	7/25/2013	6:07a	SAC	1.37
Carmel High School	Fri	7/26/2013	4:45a	Fri	7/26/2013	6:08a	SAC	1.38
Carmel High School	Mon	7/29/2013	4:45a	Mon	7/29/2013	6:11a	SAC	1.43
Carmel High School	Tue	7/30/2013	4:45a	Tue	7/30/2013	6:11a	SAC	1.43
Carmel High School	Wed	7/31/2013	4:45a	Wed	7/31/2013	6:12a	SAC	1.45
Carmel High School	Thu	8/1/2013	4:45a	Thu	8/1/2013	6:13a	SAC	1.47
Carmel High School	Fri	8/2/2013	4:45a	Fri	8/2/2013	6:14a	SAC	1.48
Carmel High School	Mon	8/5/2013	4:45a	Mon	8/5/2013	6:16a	SAC	1.52
Carmel High School	Tue	8/6/2013	4:45a	Tue	8/6/2013	6:17a	SAC	1.53
Carmel High School	Wed	8/7/2013	4:45a	Wed	8/7/2013	6:18a	SAC	1.55
Carmel High School	Thu	8/8/2013	4:45a	Thu	8/8/2013	6:19a	SAC	1.57
Carmel High School	Fri	8/9/2013	4:45a	Fri	8/9/2013	6:20a	SAC	1.58
Carmel High School	Mon	8/12/2013	4:45a	Mon	8/12/2013	6:22a	SAC	1.62
Carmel High School	Tue	8/13/2013	4:45a	Tue	8/13/2013	6:23a	SAC	1.63
Carmel High School	Wed	8/14/2013	4:45a	Wed	8/14/2013	6:24a	SAC	1.65
Carmel High School	Thu	8/15/2013	4:45a	Thu	8/15/2013	6:25a	SAC	1.67
Carmel High School	Fri	8/16/2013	4:45a	Fri	8/16/2013	6:25a	SAC	1.67
Carmel High School	Mon	8/19/2013	4:45a	Mon	8/19/2013	6:28a	SAC	1.72
Carmel High School	Tue	8/20/2013	4:45a	Tue	8/20/2013	6:29a	SAC	1.73
Carmel High School	Wed	8/21/2013	4:45a	Wed	8/21/2013	6:30a	SAC	1.75
Carmel High School	Thu	8/22/2013	4:45a	Thu	8/22/2013	6:30a	SAC	1.75
Carmel High School	Fri	8/23/2013	4:45a	Fri	8/23/2013	6:31a	SAC	1.77
Carmel High School	Mon	8/26/2013	4:45a	Mon	8/26/2013	6:34a	SAC	1.82
Carmel High School	Mon	8/26/2013	7:15p	Mon	8/26/2013	8:10p	Water Polo	0.92
Carmel High School	Tue	8/27/2013	4:45a	Tue	8/27/2013	6:34a	SAC	1.82

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Carmel High School	Tue	8/27/2013	7:13p	Tue	8/27/2013	8:10p	Water Polo	0.95
Carmel High School	Wed	8/28/2013	4:45a	Wed	8/28/2013	6:35a	SAC	1.83
Carmel High School	Wed	8/28/2013	7:12p	Wed	8/28/2013	8:10p	Water Polo	0.97
Carmel High School	Thu	8/29/2013	4:45a	Thu	8/29/2013	6:36a	SAC	1.85
Carmel High School	Thu	8/29/2013	7:11p	Thu	8/29/2013	8:10p	Water Polo	0.98
Carmel High School	Fri	8/30/2013	4:45a	Fri	8/30/2013	6:37a	SAC	1.87
Carmel High School	Fri	8/30/2013	7:09p	Fri	8/30/2013	8:10p	Water Polo	1.02
Carmel High School	Tue	9/3/2013	4:45a	Tue	9/3/2013	6:40a	SAC	1.92
Carmel High School	Tue	9/3/2013	7:03p	Tue	9/3/2013	8:10p	Water Polo	1.12
Carmel High School	Wed	9/4/2013	4:45a	Wed	9/4/2013	6:41a	SAC	1.93
Carmel High School	Wed	9/4/2013	7:02p	Wed	9/4/2013	8:10p	Water Polo	1.13
Carmel High School	Thu	9/5/2013	4:45a	Thu	9/5/2013	6:42a	SAC	1.95
Carmel High School	Thu	9/5/2013	7:00p	Thu	9/5/2013	8:10p	Water Polo	1.17
Carmel High School	Fri	9/6/2013	4:45a	Fri	9/6/2013	6:43a	SAC	1.97
Carmel High School	Fri	9/6/2013	6:59p	Fri	9/6/2013	8:10p	Water Polo	1.18
Carmel High School	Mon	9/9/2013	4:45a	Mon	9/9/2013	6:45a	SAC	2
Carmel High School	Mon	9/9/2013	6:55p	Mon	9/9/2013	8:10p	Water Polo	1.25
Carmel High School	Tue	9/10/2013	4:45a	Tue	9/10/2013	6:46a	SAC	2.02
Carmel High School	Wed	9/11/2013	4:45a	Wed	9/11/2013	6:47a	SAC	2.03
Carmel High School	Wed	9/11/2013	6:52p	Wed	9/11/2013	8:10p	Water Polo	1.3
Carmel High School	Thu	9/12/2013	4:45a	Thu	9/12/2013	6:47a	SAC	2.03
Carmel High School	Fri	9/13/2013	4:45a	Fri	9/13/2013	6:48a	SAC	2.05
Carmel High School	Fri	9/13/2013	6:48p	Fri	9/13/2013	8:10p	Water Polo	1.37
Carmel High School	Mon	9/16/2013	4:45a	Mon	9/16/2013	6:51a	SAC	2.1
Carmel High School	Mon	9/16/2013	6:44p	Mon	9/16/2013	8:10p	Water Polo	1.43
Carmel High School	Tue	9/17/2013	6:42p	Tue	9/17/2013	8:10p	Water Polo	1.47
Carmel High School	Tue	9/17/2013	4:45a	Tue	9/17/2013	6:51a	SAC	2.1
Carmel High School	Wed	9/18/2013	4:45a	Wed	9/18/2013	6:52a	SAC	2.12
Carmel High School	Wed	9/18/2013	6:41p	Wed	9/18/2013	8:10p	Water Polo	1.48
Carmel High School	Thu	9/19/2013	6:39p	Thu	9/19/2013	8:10p	Water Polo	1.52
Carmel High School	Thu	9/19/2013	4:45a	Thu	9/19/2013	6:53a	SAC	2.13
Carmel High School	Fri	9/20/2013	4:45a	Fri	9/20/2013	6:54a	SAC	2.15
Carmel High School	Fri	9/20/2013	6:38p	Fri	9/20/2013	8:10p	Water Polo	1.53
Carmel High School	Mon	9/23/2013	4:45a	Mon	9/23/2013	6:56a	SAC	2.18
Carmel High School	Mon	9/23/2013	6:33p	Mon	9/23/2013	8:10p	Water Polo	1.62
Carmel High School	Tue	9/24/2013	4:45a	Tue	9/24/2013	6:57a	SAC	2.2
Carmel High School	Tue	9/24/2013	6:32p	Tue	9/24/2013	8:10p	Water Polo	1.63
Carmel High School	Wed	9/25/2013	4:45a	Wed	9/25/2013	6:58a	SAC	2.22
Carmel High School	Wed	9/25/2013	6:30p	Wed	9/25/2013	8:10p	Water Polo	1.67
Carmel High School	Thu	9/26/2013	4:45a	Thu	9/26/2013	6:59a	SAC	2.23
Carmel High School	Fri	9/27/2013	4:45a	Fri	9/27/2013	7:00a	SAC	2.25
Carmel High School	Fri	9/27/2013	6:27p	Fri	9/27/2013	8:10p	Water Polo	1.72
Carmel High School	Mon	9/30/2013	4:45a	Mon	9/30/2013	7:02a	SAC	2.28
Carmel High School	Mon	9/30/2013	6:23p	Mon	9/30/2013	8:10p	Water Polo	1.78
Carmel High School	Tue	10/1/2013	4:45a	Tue	10/1/2013	7:03a	SAC	2.3
Carmel High School	Wed	10/2/2013	4:45a	Wed	10/2/2013	7:04a	SAC	2.32
Carmel High School	Wed	10/2/2013	6:20p	Wed	10/2/2013	8:10p	Water Polo	1.83
Carmel High School	Thu	10/3/2013	4:45a	Thu	10/3/2013	7:05a	SAC	2.33
Carmel High School	Thu	10/3/2013	6:18p	Thu	10/3/2013	8:10p	Water Polo	1.87
Carmel High School	Fri	10/4/2013	4:45a	Fri	10/4/2013	7:06a	SAC	2.35
Carmel High School	Fri	10/4/2013	6:17p	Fri	10/4/2013	8:10p	Water Polo	1.88
Carmel High School	Mon	10/7/2013	4:45a	Mon	10/7/2013	7:08a	SAC	2.38
Carmel High School	Mon	10/7/2013	6:12p	Mon	10/7/2013	8:10p	Water Polo	1.97
Carmel High School	Tue	10/8/2013	6:11p	Tue	10/8/2013	6:30p	Water Polo	0.32
Carmel High School	Tue	10/8/2013	4:45a	Tue	10/8/2013	7:09a	SAC	2.4
Carmel High School	Wed	10/9/2013	4:45a	Wed	10/9/2013	7:10a	SAC	2.42
Carmel High School	Wed	10/9/2013	6:09p	Wed	10/9/2013	8:10p	Water Polo	2.02
Carmel High School	Thu	10/10/2013	6:08p	Thu	10/10/2013	6:30p	Water Polo	0.37

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Carmel High School	Thu	10/10/2013	4:45a	Thu	10/10/2013	7:11a	SAC	2.43
Carmel High School	Fri	10/11/2013	4:45a	Fri	10/11/2013	7:12a	SAC	2.45
Carmel High School	Fri	10/11/2013	6:07p	Fri	10/11/2013	8:10p	Water Polo	2.05
Carmel High School	Mon	10/14/2013	4:45a	Mon	10/14/2013	7:14a	SAC	2.48
Carmel High School	Mon	10/14/2013	6:02p	Mon	10/14/2013	7:45p	Water Polo	1.72
Carmel High School	Tue	10/15/2013	4:45a	Tue	10/15/2013	7:15a	SAC	2.5
Carmel High School	Tue	10/15/2013	6:01p	Tue	10/15/2013	7:45p	Water Polo	1.73
Carmel High School	Wed	10/16/2013	4:45a	Wed	10/16/2013	7:16a	SAC	2.52
Carmel High School	Thu	10/17/2013	4:45a	Thu	10/17/2013	7:17a	SAC	2.53
Carmel High School	Fri	10/18/2013	4:45a	Fri	10/18/2013	7:18a	SAC	2.55
Carmel High School	Mon	10/21/2013	4:45a	Mon	10/21/2013	7:21a	SAC	2.6
Carmel High School	Mon	10/21/2013	5:53p	Mon	10/21/2013	8:10p	Water Polo	2.28
Carmel High School	Tue	10/22/2013	5:52p	Tue	10/22/2013	6:30p	Water Polo	0.63
Carmel High School	Tue	10/22/2013	4:45a	Tue	10/22/2013	7:22a	SAC	2.62
Carmel High School	Wed	10/23/2013	4:45a	Wed	10/23/2013	7:23a	SAC	2.63
Carmel High School	Wed	10/23/2013	5:51p	Wed	10/23/2013	8:10p	Water Polo	2.32
Carmel High School	Thu	10/24/2013	4:45a	Thu	10/24/2013	7:00a	SAC	2.25
Carmel High School	Thu	10/24/2013	5:49p	Thu	10/24/2013	8:10p	Water Polo	2.35
Carmel High School	Fri	10/25/2013	5:48p	Fri	10/25/2013	8:50p	Water Polo	3.03
Carmel High School	Fri	10/25/2013	4:45a	Fri	10/25/2013	7:00a	SAC	2.25
Carmel High School	Sat	10/26/2013	5:47p	Sat	10/26/2013	7:00p	Water Polo	1.22
Carmel High School	Mon	10/28/2013	5:45p	Mon	10/28/2013	8:10p	Water Polo	2.42
Carmel High School	Mon	10/28/2013	4:45a	Mon	10/28/2013	7:00a	SAC	2.25
Carmel High School	Tue	10/29/2013	5:44p	Tue	10/29/2013	8:10p	Water Polo	2.43
Carmel High School	Tue	10/29/2013	4:45a	Tue	10/29/2013	7:00a	SAC	2.25
Carmel High School	Wed	10/30/2013	4:45a	Wed	10/30/2013	7:00a	SAC	2.25
Carmel High School	Wed	10/30/2013	5:42p	Wed	10/30/2013	8:10p	Water Polo	2.47
Carmel High School	Thu	10/31/2013	5:41p	Thu	10/31/2013	8:10p	Water Polo	2.48
Carmel High School	Thu	10/31/2013	4:45a	Thu	10/31/2013	7:00a	SAC	2.25
Carmel High School	Thu	10/31/2013	5:41p	Thu	10/31/2013	8:10p	Water Polo	2.48
Carmel High School	Fri	11/1/2013	5:40p	Fri	11/1/2013	8:30p	Water Polo	2.83
Carmel High School	Fri	11/1/2013	4:45a	Fri	11/1/2013	7:00a	SAC	2.25
Carmel High School	Fri	11/1/2013	5:40p	Fri	11/1/2013	8:10p	Water Polo	2.5
Carmel High School	Mon	11/4/2013	4:45a	Mon	11/4/2013	7:00a	SAC	2.25
Carmel High School	Mon	11/4/2013	4:37p	Mon	11/4/2013	8:10p	Water Polo	3.55
Carmel High School	Tue	11/5/2013	4:45a	Tue	11/5/2013	7:00a	SAC	2.25
Carmel High School	Tue	11/5/2013	4:36p	Tue	11/5/2013	8:10p	Water Polo	3.57
Carmel High School	Wed	11/6/2013	4:45a	Wed	11/6/2013	7:00a	SAC	2.25
Carmel High School	Wed	11/6/2013	4:35p	Wed	11/6/2013	8:10p	Water Polo	3.58
Carmel High School	Thu	11/7/2013	4:45a	Thu	11/7/2013	7:00a	SAC	2.25
Carmel High School	Thu	11/7/2013	4:34p	Thu	11/7/2013	8:10p	Water Polo	3.6
Carmel High School	Fri	11/8/2013	4:45a	Fri	11/8/2013	7:00a	SAC	2.25
Carmel High School	Fri	11/8/2013	4:33p	Fri	11/8/2013	8:10p	Water Polo	3.62
Carmel High School	Tue	11/12/2013	4:30p	Tue	11/12/2013	9:00p	Water Polo	4.5
Carmel High School	Tue	11/12/2013	4:45a	Tue	11/12/2013	6:43a	SAC	1.97
Carmel High School	Wed	11/13/2013	4:45a	Wed	11/13/2013	6:44a	SAC	1.98
Carmel High School	Wed	11/13/2013	4:29p	Wed	11/13/2013	8:10p	Water Polo	3.68
Carmel High School	Thu	11/14/2013	4:45a	Thu	11/14/2013	6:45a	SAC	2
Carmel High School	Thu	11/14/2013	4:29p	Thu	11/14/2013	8:10p	Water Polo	3.68
Carmel High School	Fri	11/15/2013	4:45a	Fri	11/15/2013	6:46a	SAC	2.02
Carmel High School	Fri	11/15/2013	4:28p	Fri	11/15/2013	8:10p	Water Polo	3.7
Carmel High School	Mon	11/18/2013	4:45a	Mon	11/18/2013	6:49a	SAC	2.07
Carmel High School	Tue	11/19/2013	4:45a	Tue	11/19/2013	6:50a	SAC	2.08
Carmel High School	Wed	11/20/2013	4:45a	Wed	11/20/2013	6:51a	SAC	2.1
Carmel High School	Thu	11/21/2013	4:45a	Thu	11/21/2013	6:53a	SAC	2.13
Carmel High School	Fri	11/22/2013	4:45a	Fri	11/22/2013	6:54a	SAC	2.15
Carmel High School	Mon	11/25/2013	4:45a	Mon	11/25/2013	6:57a	SAC	2.2
Carmel High School	Tue	11/26/2013	4:45a	Tue	11/26/2013	6:58a	SAC	2.22



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Carmel High School	Wed	11/27/2013	4:45a	Wed	11/27/2013	6:58a	SAC	2.22
Carmel High School	Mon	12/2/2013	4:45a	Mon	12/2/2013	7:03a	SAC	2.3
Carmel High School	Mon	12/2/2013	4:21p	Mon	12/2/2013	7:15p	Legacy WP	2.9
Carmel High School	Tue	12/3/2013	4:45a	Tue	12/3/2013	7:04a	SAC	2.32
Carmel High School	Tue	12/3/2013	4:21p	Tue	12/3/2013	6:45p	Legacy WP	2.4
Carmel High School	Wed	12/4/2013	4:45a	Wed	12/4/2013	7:05a	SAC	2.33
Carmel High School	Wed	12/4/2013	4:21p	Wed	12/4/2013	8:20p	Legacy WP	3.98
Carmel High School	Thu	12/5/2013	4:45a	Thu	12/5/2013	7:06a	SAC	2.35
Carmel High School	Fri	12/6/2013	4:45a	Fri	12/6/2013	7:07a	SAC	2.37
Carmel High School	Fri	12/6/2013	4:20p	Fri	12/6/2013	7:25p	Legacy WP	3.08
Carmel High School	Mon	12/9/2013	4:45a	Mon	12/9/2013	7:09a	SAC	2.4
Carmel High School	Mon	12/9/2013	4:21p	Mon	12/9/2013	7:25p	Legacy WP	3.07
Carmel High School	Tue	12/10/2013	4:45a	Tue	12/10/2013	7:10a	SAC	2.42
Carmel High School	Wed	12/11/2013	4:45a	Wed	12/11/2013	7:11a	SAC	2.43
Carmel High School	Wed	12/11/2013	4:21p	Wed	12/11/2013	8:15p	Legacy WP	3.9
Carmel High School	Thu	12/12/2013	4:45a	Thu	12/12/2013	7:12a	SAC	2.45
Carmel High School	Thu	12/12/2013	4:21p	Thu	12/12/2013	8:15p	Legacy WP	3.9
Carmel High School	Fri	12/13/2013	4:45a	Fri	12/13/2013	7:12a	SAC	2.45
Carmel High School	Mon	12/16/2013	4:45a	Mon	12/16/2013	7:14a	SAC	2.48
Carmel High School	Mon	12/16/2013	4:22p	Mon	12/16/2013	7:15p	Legacy WP	2.88
Carmel High School	Tue	12/17/2013	4:45a	Tue	12/17/2013	7:15a	SAC	2.5
Carmel High School	Tue	12/17/2013	4:22p	Tue	12/17/2013	8:15p	Legacy WP	3.88
Carmel High School	Wed	12/18/2013	4:45a	Wed	12/18/2013	7:16a	SAC	2.52
Carmel High School	Wed	12/18/2013	4:23p	Wed	12/18/2013	8:15p	Legacy WP	3.87
Carmel High School	Thu	12/19/2013	4:45a	Thu	12/19/2013	7:16a	SAC	2.52
Carmel High School	Fri	12/20/2013	4:45a	Fri	12/20/2013	7:17a	SAC	2.53
Carmel High School	Fri	12/20/2013	4:24p	Fri	12/20/2013	7:15p	Legacy WP	2.85
Carmel High School	Mon	12/30/2013	4:45a	Mon	12/30/2013	7:20a	SAC	2.58
Carmel High School	Tue	12/31/2013	4:45a	Tue	12/31/2013	7:21a	SAC	2.6
Carmel High School	Thu	1/2/2014	4:45a	Thu	1/2/2014	7:21a	SAC	2.6
Carmel High School	Fri	1/3/2014	4:45a	Fri	1/3/2014	7:21a	SAC	2.6
Carmel High School	Mon	1/6/2014	4:45a	Mon	1/6/2014	7:21a	SAC	2.6
Carmel High School	Mon	1/6/2014	4:35p	Mon	1/6/2014	7:15p	Legacy WP	2.67
Carmel High School	Tue	1/7/2014	4:45a	Tue	1/7/2014	7:21a	SAC	2.6
Carmel High School	Tue	1/7/2014	4:36p	Tue	1/7/2014	8:15p	Legacy WP	3.65
Carmel High School	Wed	1/8/2014	4:45a	Wed	1/8/2014	7:21a	SAC	2.6
Carmel High School	Thu	1/9/2014	4:45a	Thu	1/9/2014	7:21a	SAC	2.6
Carmel High School	Thu	1/9/2014	4:38p	Thu	1/9/2014	8:15p	Legacy WP	3.62
Carmel High School	Fri	1/10/2014	4:45a	Fri	1/10/2014	7:21a	SAC	2.6
Carmel High School	Mon	1/13/2014	4:45a	Mon	1/13/2014	7:20a	SAC	2.58
Carmel High School	Mon	1/13/2014	4:42p	Mon	1/13/2014	7:25p	Legacy WP	2.72
Carmel High School	Tue	1/14/2014	4:45a	Tue	1/14/2014	7:20a	SAC	2.58
Carmel High School	Tue	1/14/2014	4:43p	Tue	1/14/2014	8:15p	Legacy WP	3.53
Carmel High School	Wed	1/15/2014	4:45a	Wed	1/15/2014	7:20a	SAC	2.58
Carmel High School	Thu	1/16/2014	4:45a	Thu	1/16/2014	7:19a	SAC	2.57
Carmel High School	Thu	1/16/2014	4:45p	Thu	1/16/2014	8:15p	Legacy WP	3.5
Carmel High School	Fri	1/17/2014	4:45a	Fri	1/17/2014	7:19a	SAC	2.57
Carmel High School	Tue	1/21/2014	4:45a	Tue	1/21/2014	7:17a	SAC	2.53
Carmel High School	Tue	1/21/2014	4:50p	Tue	1/21/2014	8:15p	Legacy WP	3.42
Carmel High School	Wed	1/22/2014	4:45a	Wed	1/22/2014	7:17a	SAC	2.53
Carmel High School	Thu	1/23/2014	4:45a	Thu	1/23/2014	7:16a	SAC	2.52
Carmel High School	Fri	1/24/2014	4:45a	Fri	1/24/2014	7:16a	SAC	2.52
Carmel High School	Mon	1/27/2014	4:45a	Mon	1/27/2014	7:14a	SAC	2.48
Carmel High School	Mon	1/27/2014	4:57p	Mon	1/27/2014	7:25p	Legacy WP	2.47
Carmel High School	Tue	1/28/2014	4:45a	Tue	1/28/2014	7:13a	SAC	2.47
Carmel High School	Tue	1/28/2014	4:58p	Tue	1/28/2014	8:15p	Legacy WP	3.28
Carmel High School	Wed	1/29/2014	4:45a	Wed	1/29/2014	7:12a	SAC	2.45
Carmel High School	Thu	1/30/2014	4:45a	Thu	1/30/2014	7:12a	SAC	2.45

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Carmel High School	Fri	1/31/2014	4:45a	Fri	1/31/2014	7:11a	SAC	2.43
Carmel High School	Mon	2/3/2014	4:45a	Mon	2/3/2014	7:08a	SAC	2.38
Carmel High School	Tue	2/4/2014	4:45a	Tue	2/4/2014	7:07a	SAC	2.37
Carmel High School	Wed	2/5/2014	4:45a	Wed	2/5/2014	7:07a	SAC	2.37
Carmel High School	Thu	2/6/2014	4:45a	Thu	2/6/2014	7:06a	SAC	2.35
Carmel High School	Fri	2/7/2014	4:45a	Fri	2/7/2014	7:05a	SAC	2.33
Carmel High School	Mon	2/10/2014	4:45a	Mon	2/10/2014	7:02a	SAC	2.28
Carmel High School	Tue	2/11/2014	4:45a	Tue	2/11/2014	7:01a	SAC	2.27
Carmel High School	Wed	2/12/2014	4:45a	Wed	2/12/2014	6:59a	SAC	2.23
Carmel High School	Thu	2/13/2014	4:45a	Thu	2/13/2014	6:58a	SAC	2.22
Carmel High School	Fri	2/14/2014	4:45a	Fri	2/14/2014	6:57a	SAC	2.2
Carmel High School	Mon	2/17/2014	4:45a	Mon	2/17/2014	6:54a	SAC	2.15
Carmel High School	Tue	2/18/2014	4:45a	Tue	2/18/2014	6:53a	SAC	2.13
Carmel High School	Wed	2/19/2014	4:45a	Wed	2/19/2014	6:51a	SAC	2.1
Carmel High School	Thu	2/20/2014	4:45a	Thu	2/20/2014	6:50a	SAC	2.08
Carmel High School	Fri	2/21/2014	4:45a	Fri	2/21/2014	6:49a	SAC	2.07
Carmel High School	Mon	2/24/2014	4:45a	Mon	2/24/2014	6:45a	SAC	2
Carmel High School	Tue	2/25/2014	4:45a	Tue	2/25/2014	6:44a	SAC	1.98
Carmel High School	Wed	2/26/2014	4:45a	Wed	2/26/2014	6:42a	SAC	1.95
Carmel High School	Thu	2/27/2014	4:45a	Thu	2/27/2014	6:41a	SAC	1.93
Carmel High School	Fri	2/28/2014	4:45a	Fri	2/28/2014	6:40a	SAC	1.92
Carmel High School	Mon	3/3/2014	4:45a	Mon	3/3/2014	6:36a	SAC	1.85
Carmel High School	Mon	3/3/2014	6:16p	Mon	3/3/2014	8:00p		1.73
Carmel High School	Tue	3/4/2014	4:45a	Tue	3/4/2014	6:34a	SAC	1.82
Carmel High School	Tue	3/4/2014	5:34p	Tue	3/4/2014	7:45p	Legacy WP	2.18
Carmel High School	Wed	3/5/2014	4:45a	Wed	3/5/2014	6:33a	SAC	1.8
Carmel High School	Wed	3/5/2014	5:35p	Wed	3/5/2014	7:45p	Legacy WP	2.17
Carmel High School	Thu	3/6/2014	4:45a	Thu	3/6/2014	6:31a	SAC	1.77
Carmel High School	Thu	3/6/2014	5:36p	Thu	3/6/2014	7:45p	Legacy WP	2.15
Carmel High School	Fri	3/7/2014	4:45a	Fri	3/7/2014	6:30a	SAC	1.75
Carmel High School	Fri	3/7/2014	5:37p	Fri	3/7/2014	7:45p	Legacy WP	2.13
Carmel High School	Mon	3/10/2014	4:45a	Mon	3/10/2014	7:26a	SAC	2.68
Carmel High School	Mon	3/10/2014	6:40p	Mon	3/10/2014	8:15p	SAC	1.58
Carmel High School	Tue	3/11/2014	4:45a	Tue	3/11/2014	7:24a	SAC	2.65
Carmel High School	Tue	3/11/2014	6:41p	Tue	3/11/2014	8:15p	SAC	1.57
Carmel High School	Wed	3/12/2014	4:45a	Wed	3/12/2014	7:23a	SAC	2.63
Carmel High School	Wed	3/12/2014	6:42p	Wed	3/12/2014	8:15p	SAC	1.55
Carmel High School	Thu	3/13/2014	4:45a	Thu	3/13/2014	7:21a	SAC	2.6
Carmel High School	Thu	3/13/2014	6:43p	Thu	3/13/2014	8:15p	SAC	1.53
Carmel High School	Fri	3/14/2014	4:45a	Fri	3/14/2014	7:20a	SAC	2.58
Carmel High School	Mon	3/17/2014	4:45a	Mon	3/17/2014	7:16a	SAC	2.52
Carmel High School	Mon	3/17/2014	6:46p	Mon	3/17/2014	8:15p	SAC	1.48
Carmel High School	Tue	3/18/2014	4:45a	Tue	3/18/2014	7:14a	SAC	2.48
Carmel High School	Tue	3/18/2014	6:47p	Tue	3/18/2014	8:15p	SAC	1.47
Carmel High School	Wed	3/19/2014	4:45a	Wed	3/19/2014	7:13a	SAC	2.47
Carmel High School	Wed	3/19/2014	6:48p	Wed	3/19/2014	8:15p	SAC	1.45
Carmel High School	Thu	3/20/2014	4:45a	Thu	3/20/2014	7:11a	SAC	2.43
Carmel High School	Thu	3/20/2014	6:49p	Thu	3/20/2014	8:15p	SAC	1.43
Carmel High School	Fri	3/21/2014	4:45a	Fri	3/21/2014	7:10a	SAC	2.42
Carmel High School	Mon	3/24/2014	4:45a	Mon	3/24/2014	7:05a	SAC	2.33
Carmel High School	Mon	3/24/2014	6:52p	Mon	3/24/2014	8:15p	SAC	1.38
Carmel High School	Tue	3/25/2014	4:45a	Tue	3/25/2014	7:04a	SAC	2.32
Carmel High School	Tue	3/25/2014	6:53p	Tue	3/25/2014	8:15p	SAC	1.37
Carmel High School	Wed	3/26/2014	4:45a	Wed	3/26/2014	7:02a	SAC	2.28
Carmel High School	Wed	3/26/2014	6:54p	Wed	3/26/2014	8:15p	SAC	1.35
Carmel High School	Thu	3/27/2014	4:45a	Thu	3/27/2014	7:01a	SAC	2.27
Carmel High School	Thu	3/27/2014	6:55p	Thu	3/27/2014	8:15p	SAC	1.33
Carmel High School	Fri	3/28/2014	4:45a	Fri	3/28/2014	6:59a	SAC	2.23



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Carmel High School	Fri	3/28/2014	6:56p	Fri	3/28/2014	8:15p	SAC	1.32
Carmel High School	Mon	3/31/2014	4:45a	Mon	3/31/2014	6:55a	SAC	2.17
Carmel High School	Mon	3/31/2014	6:59p	Mon	3/31/2014	8:15p	SAC	1.27
Carmel High School	Tue	4/1/2014	4:45a	Tue	4/1/2014	6:53a	SAC	2.13
Carmel High School	Tue	4/1/2014	7:00p	Tue	4/1/2014	8:15p	SAC	1.25
Carmel High School	Wed	4/2/2014	4:45a	Wed	4/2/2014	6:52a	SAC	2.12
Carmel High School	Wed	4/2/2014	7:00p	Wed	4/2/2014	8:15p	SAC	1.25
Carmel High School	Thu	4/3/2014	4:45a	Thu	4/3/2014	6:50a	SAC	2.08
Carmel High School	Thu	4/3/2014	7:01p	Thu	4/3/2014	8:15p	SAC	1.23
Carmel High School	Fri	4/4/2014	4:45a	Fri	4/4/2014	6:49a	SAC	2.07
Carmel High School	Fri	4/4/2014	7:02p	Fri	4/4/2014	8:15p	SAC	1.22
Carmel High School	Mon	4/7/2014	4:45a	Mon	4/7/2014	6:44a	SAC	1.98
Carmel High School	Mon	4/7/2014	7:05p	Mon	4/7/2014	8:15p	SAC	1.17
Carmel High School	Tue	4/8/2014	4:45a	Tue	4/8/2014	6:43a	SAC	1.97
Carmel High School	Tue	4/8/2014	7:06p	Tue	4/8/2014	8:15p	SAC	1.15
Carmel High School	Wed	4/9/2014	4:45a	Wed	4/9/2014	6:42a	SAC	1.95
Carmel High School	Wed	4/9/2014	7:07p	Wed	4/9/2014	8:15p	SAC	1.13
Carmel High School	Thu	4/10/2014	4:45a	Thu	4/10/2014	6:40a	SAC	1.92
Carmel High School	Thu	4/10/2014	7:07p	Thu	4/10/2014	8:15p	SAC	1.13
Carmel High School	Fri	4/11/2014	4:45a	Fri	4/11/2014	6:39a	SAC	1.9
Carmel High School	Mon	4/14/2014	4:45a	Mon	4/14/2014	6:35a	SAC	1.83
Carmel High School	Mon	4/14/2014	7:11p	Mon	4/14/2014	8:15p	SAC	1.07
Carmel High School	Tue	4/15/2014	4:45a	Tue	4/15/2014	6:33a	SAC	1.8
Carmel High School	Tue	4/15/2014	7:12p	Tue	4/15/2014	8:15p	SAC	1.05
Carmel High School	Wed	4/16/2014	4:45a	Wed	4/16/2014	6:32a	SAC	1.78
Carmel High School	Wed	4/16/2014	7:13p	Wed	4/16/2014	8:15p	SAC	1.03
Carmel High School	Thu	4/17/2014	4:45a	Thu	4/17/2014	6:31a	SAC	1.77
Carmel High School	Thu	4/17/2014	7:14p	Thu	4/17/2014	8:15p	SAC	1.02
Carmel High School	Mon	4/21/2014	4:45a	Mon	4/21/2014	6:25a	SAC	1.67
Carmel High School	Mon	4/21/2014	7:17p	Mon	4/21/2014	8:15p	SAC	0.97
Carmel High School	Tue	4/22/2014	4:45a	Tue	4/22/2014	6:24a	SAC	1.65
Carmel High School	Tue	4/22/2014	7:18p	Tue	4/22/2014	8:15p	SAC	0.95
Carmel High School	Wed	4/23/2014	4:45a	Wed	4/23/2014	6:23a	SAC	1.63
Carmel High School	Wed	4/23/2014	7:19p	Wed	4/23/2014	8:15p	SAC	0.93
Carmel High School	Thu	4/24/2014	4:45a	Thu	4/24/2014	6:21a	SAC	1.6
Carmel High School	Thu	4/24/2014	7:20p	Thu	4/24/2014	8:15p	SAC	0.92
Carmel High School	Fri	4/25/2014	4:45a	Fri	4/25/2014	6:20a	SAC	1.58
Carmel High School	Mon	4/28/2014	4:45a	Mon	4/28/2014	6:17a	SAC	1.53
Carmel High School	Mon	4/28/2014	7:23p	Mon	4/28/2014	8:15p	SAC	0.87
Carmel High School	Tue	4/29/2014	4:45a	Tue	4/29/2014	6:15a	SAC	1.5
Carmel High School	Tue	4/29/2014	7:24p	Tue	4/29/2014	8:15p	SAC	0.85
Carmel High School	Wed	4/30/2014	4:45a	Wed	4/30/2014	6:14a	SAC	1.48
Carmel High School	Wed	4/30/2014	7:25p	Wed	4/30/2014	8:15p	SAC	0.83
Carmel High School	Thu	5/1/2014	4:45a	Thu	5/1/2014	6:13a	SAC	1.47
Carmel High School	Thu	5/1/2014	7:26p	Thu	5/1/2014	8:15p	SAC	0.82
Carmel High School	Fri	5/2/2014	4:45a	Fri	5/2/2014	6:12a	SAC	1.45
Carmel High School	Mon	5/5/2014	4:45a	Mon	5/5/2014	6:09a	SAC	1.4
Carmel High School	Tue	5/6/2014	4:45a	Tue	5/6/2014	6:08a	SAC	1.38
Carmel High School	Wed	5/7/2014	4:45a	Wed	5/7/2014	6:07a	SAC	1.37
Carmel High School	Thu	5/8/2014	4:45a	Thu	5/8/2014	6:06a	SAC	1.35
Carmel High School	Fri	5/9/2014	7:33p	Fri	5/9/2014	10:45p		3.2
Carmel High School	Fri	5/9/2014	4:45a	Fri	5/9/2014	6:05a	SAC	1.33
Carmel High School	Mon	5/12/2014	4:45a	Mon	5/12/2014	6:02a	SAC	1.28
Carmel High School	Tue	5/13/2014	4:45a	Tue	5/13/2014	6:01a	SAC	1.27
Carmel High School	Wed	5/14/2014	4:45a	Wed	5/14/2014	6:00a	SAC	1.25
Carmel High School	Thu	5/15/2014	4:45a	Thu	5/15/2014	5:59a	SAC	1.23
Carmel High School	Fri	5/16/2014	4:45a	Fri	5/16/2014	5:59a	SAC	1.23
Carmel High School	Mon	5/19/2014	4:45a	Mon	5/19/2014	5:56a	SAC	1.18

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Carmel High School	Tue	5/20/2014	4:45a	Tue	5/20/2014	5:56a	SAC	1.18
Carmel High School	Wed	5/21/2014	4:45a	Wed	5/21/2014	5:55a	SAC	1.17
Carmel High School	Thu	5/22/2014	4:45a	Thu	5/22/2014	5:54a	SAC	1.15
Carmel High School	Fri	5/23/2014	4:45a	Fri	5/23/2014	5:54a	SAC	1.15
Carmel High School	Mon	5/26/2014	4:45a	Mon	5/26/2014	5:52a	SAC	1.12
Carmel High School	Tue	5/27/2014	4:45a	Tue	5/27/2014	5:51a	SAC	1.1
Carmel High School	Wed	5/28/2014	4:45a	Wed	5/28/2014	5:51a	SAC	1.1
Carmel High School	Thu	5/29/2014	4:45a	Thu	5/29/2014	5:51a	SAC	1.1
Carmel High School	Fri	5/30/2014	4:45a	Fri	5/30/2014	5:50a	SAC	1.08
Carmel High School	Mon	6/2/2014	4:45a	Mon	6/2/2014	5:49a	SAC	1.07
Carmel High School	Tue	6/3/2014	4:45a	Tue	6/3/2014	5:49a	SAC	1.07
Carmel High School	Wed	6/4/2014	4:45a	Wed	6/4/2014	5:48a	SAC	1.05
Carmel High School	Thu	6/5/2014	4:45a	Thu	6/5/2014	5:48a	SAC	1.05
Carmel High School	Fri	6/6/2014	11:45p	Sat	6/7/2014	2:15a		2.5
Carmel High School	Fri	6/6/2014	4:45a	Fri	6/6/2014	5:48a	SAC	1.05
Carmel High School	Tue	8/5/2014	4:45a	Tue	8/5/2014	6:16a	Adult Masters	1.52
Carmel High School	Wed	8/6/2014	4:45a	Wed	8/6/2014	6:17a	Adult Masters	1.53
Carmel High School	Thu	8/7/2014	4:45a	Thu	8/7/2014	6:18a	Adult Masters	1.55
Carmel High School	Fri	8/8/2014	4:45a	Fri	8/8/2014	6:19a	Adult Masters	1.57
Carmel High School	Mon	8/11/2014	4:45a	Mon	8/11/2014	6:21a	Adult Masters	1.6
Carmel High School	Tue	8/12/2014	4:45a	Tue	8/12/2014	6:22a	Adult Masters	1.62
Carmel High School	Wed	8/13/2014	4:45a	Wed	8/13/2014	6:23a	Adult Masters	1.63
Carmel High School	Thu	8/14/2014	4:45a	Thu	8/14/2014	6:24a	Adult Masters	1.65
Carmel High School	Fri	8/15/2014	4:45a	Fri	8/15/2014	6:24a	Adult Masters	1.65
Carmel High School	Mon	8/18/2014	4:45a	Mon	8/18/2014	6:27a	Adult Masters	1.7
Carmel High School	Tue	8/19/2014	4:45a	Tue	8/19/2014	6:28a	Adult Masters	1.72
Carmel High School	Wed	8/20/2014	4:45a	Wed	8/20/2014	6:28a	Adult Masters	1.72
Carmel High School	Thu	8/21/2014	4:45a	Thu	8/21/2014	6:29a	Adult Masters	1.73
Carmel High School	Fri	8/22/2014	4:45a	Fri	8/22/2014	6:30a	Adult Masters	1.75
Carmel High School	Mon	8/25/2014	4:45a	Mon	8/25/2014	6:33a	Adult Masters	1.8
Carmel High School	Tue	8/26/2014	4:45a	Tue	8/26/2014	6:33a	Adult Masters	1.8
Carmel High School	Wed	8/27/2014	4:45a	Wed	8/27/2014	6:34a	Adult Masters	1.82
Carmel High School	Thu	8/28/2014	4:45a	Thu	8/28/2014	6:35a	Adult Masters	1.83
Carmel High School	Fri	8/29/2014	4:45a	Fri	8/29/2014	6:36a	Adult Masters	1.85
Carmel High School	Tue	9/2/2014	4:45a	Tue	9/2/2014	6:39a	Adult Masters	1.9
Carmel High School	Wed	9/3/2014	4:45a	Wed	9/3/2014	6:40a	Adult Masters	1.92
Carmel High School	Thu	9/4/2014	7:02p	Thu	9/4/2014	7:50p	Water Polo	0.8
Carmel High School	Thu	9/4/2014	4:45a	Thu	9/4/2014	6:41a	Adult Masters	1.93
Carmel High School	Fri	9/5/2014	7:01p	Fri	9/5/2014	7:50p	Water Polo	0.82
Carmel High School	Fri	9/5/2014	4:45a	Fri	9/5/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/8/2014	4:45a	Mon	9/8/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/8/2014	6:56p	Mon	9/8/2014	7:50p	Water Polo	0.9
Carmel High School	Tue	9/9/2014	6:55p	Tue	9/9/2014	8:45p	Water Polo	1.83
Carmel High School	Tue	9/9/2014	4:45a	Tue	9/9/2014	7:00a	Adult Masters	2.25
Carmel High School	Tue	9/9/2014	6:55p	Tue	9/9/2014	7:50p	Water Polo	0.92
Carmel High School	Wed	9/10/2014	4:45a	Wed	9/10/2014	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/10/2014	6:53p	Wed	9/10/2014	7:50p	Water Polo	0.95
Carmel High School	Thu	9/11/2014	6:52p	Thu	9/11/2014	7:50p	Water Polo	0.97
Carmel High School	Thu	9/11/2014	4:45a	Thu	9/11/2014	7:00a	Adult Masters	2.25
Carmel High School	Fri	9/12/2014	4:45a	Fri	9/12/2014	7:00a	Adult Masters	2.25
Carmel High School	Fri	9/12/2014	6:50p	Fri	9/12/2014	7:50p	Water Polo	1
Carmel High School	Mon	9/15/2014	4:45a	Mon	9/15/2014	7:00a	Adult Masters	2.25
Carmel High School	Tue	9/16/2014	4:45a	Tue	9/16/2014	7:00a	Adult Masters	2.25
Carmel High School	Tue	9/16/2014	6:44p	Tue	9/16/2014	7:50p	Water Polo	1.1
Carmel High School	Wed	9/17/2014	4:45a	Wed	9/17/2014	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/17/2014	6:43p	Wed	9/17/2014	7:50p	Water Polo	1.12
Carmel High School	Thu	9/18/2014	6:41p	Thu	9/18/2014	8:45p	Water Polo	2.07
Carmel High School	Thu	9/18/2014	4:45a	Thu	9/18/2014	7:00a	Adult Masters	2.25

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Carmel High School	Fri	9/19/2014	4:45a	Fri	9/19/2014	7:00a	Adult Masters	2.25
Carmel High School	Fri	9/19/2014	6:40p	Fri	9/19/2014	7:50p	Water Polo	1.17
Carmel High School	Mon	9/22/2014	4:45a	Mon	9/22/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/22/2014	6:35p	Mon	9/22/2014	7:50p	Water Polo	1.25
Carmel High School	Tue	9/23/2014	4:45a	Tue	9/23/2014	7:00a	Adult Masters	2.25
Carmel High School	Tue	9/23/2014	6:34p	Tue	9/23/2014	7:50p	Water Polo	1.27
Carmel High School	Wed	9/24/2014	4:45a	Wed	9/24/2014	7:00a	Adult Masters	2.25
Carmel High School	Wed	9/24/2014	6:32p	Wed	9/24/2014	7:50p	Water Polo	1.3
Carmel High School	Thu	9/25/2014	6:31p	Thu	9/25/2014	7:00p	Water Polo	0.48
Carmel High School	Thu	9/25/2014	4:45a	Thu	9/25/2014	7:00a	Adult Masters	2.25
Carmel High School	Fri	9/26/2014	4:45a	Fri	9/26/2014	7:00a	Adult Masters	2.25
Carmel High School	Fri	9/26/2014	6:29p	Fri	9/26/2014	7:50p	Water Polo	1.35
Carmel High School	Mon	9/29/2014	4:45a	Mon	9/29/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	9/29/2014	6:25p	Mon	9/29/2014	7:50p	Water Polo	1.42
Carmel High School	Tue	9/30/2014	4:45a	Tue	9/30/2014	7:00a	Adult Masters	2.25
Carmel High School	Tue	9/30/2014	6:23p	Tue	9/30/2014	7:50p	Water Polo	1.45
Carmel High School	Wed	10/1/2014	4:45a	Wed	10/1/2014	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/1/2014	6:22p	Wed	10/1/2014	7:50p	Water Polo	1.47
Carmel High School	Thu	10/2/2014	6:20p	Thu	10/2/2014	7:00p	Water Polo	0.67
Carmel High School	Thu	10/2/2014	4:45a	Thu	10/2/2014	7:00a	Adult Masters	2.25
Carmel High School	Fri	10/3/2014	6:19p	Fri	10/3/2014	8:50p	Water Polo	2.52
Carmel High School	Fri	10/3/2014	4:45a	Fri	10/3/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/6/2014	4:45a	Mon	10/6/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/6/2014	6:14p	Mon	10/6/2014	7:50p	Water Polo	1.6
Carmel High School	Tue	10/7/2014	6:13p	Tue	10/7/2014	7:50p	Water Polo	1.62
Carmel High School	Tue	10/7/2014	4:45a	Tue	10/7/2014	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/8/2014	4:45a	Wed	10/8/2014	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/8/2014	6:11p	Wed	10/8/2014	7:50p	Water Polo	1.65
Carmel High School	Thu	10/9/2014	6:10p	Thu	10/9/2014	8:45p	Water Polo	2.58
Carmel High School	Thu	10/9/2014	4:45a	Thu	10/9/2014	7:00a	Adult Masters	2.25
Carmel High School	Thu	10/9/2014	6:10p	Thu	10/9/2014	7:50p	Water Polo	1.67
Carmel High School	Fri	10/10/2014	4:45a	Fri	10/10/2014	7:00a	Adult Masters	2.25
Carmel High School	Fri	10/10/2014	6:08p	Fri	10/10/2014	7:50p	Water Polo	1.7
Carmel High School	Mon	10/13/2014	4:45a	Mon	10/13/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/13/2014	6:04p	Mon	10/13/2014	7:50p	Water Polo	1.77
Carmel High School	Tue	10/14/2014	6:03p	Tue	10/14/2014	7:50p	Water Polo	1.78
Carmel High School	Tue	10/14/2014	4:45a	Tue	10/14/2014	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/15/2014	4:45a	Wed	10/15/2014	7:00a	Adult Masters	2.25
Carmel High School	Thu	10/16/2014	4:45a	Thu	10/16/2014	7:00a	Adult Masters	2.25
Carmel High School	Fri	10/17/2014	4:45a	Fri	10/17/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/20/2014	4:45a	Mon	10/20/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/20/2014	5:55p	Mon	10/20/2014	7:50p	Water Polo	1.92
Carmel High School	Tue	10/21/2014	5:53p	Tue	10/21/2014	7:00p	Water Polo	1.12
Carmel High School	Tue	10/21/2014	4:45a	Tue	10/21/2014	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/22/2014	4:45a	Wed	10/22/2014	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/22/2014	5:52p	Wed	10/22/2014	7:50p	Water Polo	1.97
Carmel High School	Thu	10/23/2014	4:45a	Thu	10/23/2014	7:00a	Adult Masters	2.25
Carmel High School	Thu	10/23/2014	5:51p	Thu	10/23/2014	7:50p	Water Polo	1.98
Carmel High School	Fri	10/24/2014	5:50p	Fri	10/24/2014	8:45p	Water Polo	2.92
Carmel High School	Fri	10/24/2014	4:45a	Fri	10/24/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/27/2014	4:45a	Mon	10/27/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	10/27/2014	5:46p	Mon	10/27/2014	7:50p	Water Polo	2.07
Carmel High School	Tue	10/28/2014	5:45p	Tue	10/28/2014	7:50p	Water Polo	2.08
Carmel High School	Tue	10/28/2014	4:45a	Tue	10/28/2014	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/29/2014	4:45a	Wed	10/29/2014	7:00a	Adult Masters	2.25
Carmel High School	Wed	10/29/2014	5:44p	Wed	10/29/2014	7:50p	Water Polo	2.1
Carmel High School	Thu	10/30/2014	4:45a	Thu	10/30/2014	7:00a	Adult Masters	2.25
Carmel High School	Thu	10/30/2014	5:43p	Thu	10/30/2014	7:50p	Water Polo	2.12

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Carmel High School	Fri	10/31/2014	5:42p	Fri	10/31/2014	9:15p	Water Polo	3.55
Carmel High School	Fri	10/31/2014	4:45a	Fri	10/31/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	11/3/2014	4:45a	Mon	11/3/2014	7:00a	Adult Masters	2.25
Carmel High School	Tue	11/4/2014	4:45a	Tue	11/4/2014	7:00a	Adult Masters	2.25
Carmel High School	Wed	11/5/2014	4:36p	Wed	11/5/2014	7:30p		2.9
Carmel High School	Wed	11/5/2014	4:45a	Wed	11/5/2014	7:00a	Adult Masters	2.25
Carmel High School	Thu	11/6/2014	4:36p	Thu	11/6/2014	8:15p	Water Polo	3.65
Carmel High School	Thu	11/6/2014	4:45a	Thu	11/6/2014	7:00a	Adult Masters	2.25
Carmel High School	Fri	11/7/2014	4:35p	Fri	11/7/2014	5:30p	Water Polo	0.92
Carmel High School	Fri	11/7/2014	4:45a	Fri	11/7/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	11/10/2014	4:45a	Mon	11/10/2014	7:00a	Adult Masters	2.25
Carmel High School	Mon	11/10/2014	4:32p	Mon	11/10/2014	7:30p	Water Polo	2.97
Carmel High School	Tue	11/11/2014	4:31p	Tue	11/11/2014	5:30p	Water Polo	0.98
Carmel High School	Wed	11/12/2014	4:30p	Wed	11/12/2014	8:00p	Water Polo	3.5
Carmel High School	Wed	11/12/2014	4:45a	Wed	11/12/2014	6:43a	Adult Masters	1.97
Carmel High School	Thu	11/13/2014	4:45a	Thu	11/13/2014	6:44a	Adult Masters	1.98
Carmel High School	Thu	11/13/2014	5:19p	Thu	11/13/2014	8:00p		2.68
Carmel High School	Fri	11/14/2014	4:45a	Fri	11/14/2014	6:45a	Adult Masters	2
Carmel High School	Fri	11/14/2014	4:29p	Fri	11/14/2014	6:00p	Water Polo	1.52
Carmel High School	Mon	11/17/2014	4:45a	Mon	11/17/2014	6:48a	Adult Masters	2.05
Carmel High School	Tue	11/18/2014	4:45a	Tue	11/18/2014	6:49a	Adult Masters	2.07
Carmel High School	Tue	11/18/2014	4:26p	Tue	11/18/2014	5:30p	Water Polo	1.07
Carmel High School	Wed	11/19/2014	4:45a	Wed	11/19/2014	6:50a	Adult Masters	2.08
Carmel High School	Thu	11/20/2014	4:45a	Thu	11/20/2014	6:51a	Adult Masters	2.1
Carmel High School	Fri	11/21/2014	4:45a	Fri	11/21/2014	6:52a	Adult Masters	2.12
Carmel High School	Mon	11/24/2014	4:45a	Mon	11/24/2014	6:55a	Adult Masters	2.17
Carmel High School	Tue	11/25/2014	4:45a	Tue	11/25/2014	6:56a	Adult Masters	2.18
Carmel High School	Wed	11/26/2014	4:45a	Wed	11/26/2014	6:57a	Adult Masters	2.2
Carmel High School	Mon	12/1/2014	4:45a	Mon	12/1/2014	7:02a	Adult Masters	2.28
Carmel High School	Tue	12/2/2014	4:45a	Tue	12/2/2014	7:03a	Adult Masters	2.3
Carmel High School	Wed	12/3/2014	4:45a	Wed	12/3/2014	7:04a	Adult Masters	2.32
Carmel High School	Thu	12/4/2014	4:45a	Thu	12/4/2014	7:05a	Adult Masters	2.33
Carmel High School	Fri	12/5/2014	4:45a	Fri	12/5/2014	7:06a	Adult Masters	2.35
Carmel High School	Mon	12/8/2014	4:45a	Mon	12/8/2014	7:08a	Adult Masters	2.38
Carmel High School	Tue	12/9/2014	4:45a	Tue	12/9/2014	7:09a	Adult Masters	2.4
Carmel High School	Wed	12/10/2014	4:45a	Wed	12/10/2014	7:10a	Adult Masters	2.42
Carmel High School	Thu	12/11/2014	4:45a	Thu	12/11/2014	7:11a	Adult Masters	2.43
Carmel High School	Fri	12/12/2014	4:45a	Fri	12/12/2014	7:11a	Adult Masters	2.43
Carmel High School	Mon	12/15/2014	4:45a	Mon	12/15/2014	7:13a	Adult Masters	2.47
Carmel High School	Tue	12/16/2014	4:45a	Tue	12/16/2014	7:14a	Adult Masters	2.48
Carmel High School	Wed	12/17/2014	4:45a	Wed	12/17/2014	7:15a	Adult Masters	2.5
Carmel High School	Thu	12/18/2014	4:45a	Thu	12/18/2014	7:15a	Adult Masters	2.5
Carmel High School	Fri	12/19/2014	4:45a	Fri	12/19/2014	7:16a	Adult Masters	2.52
Carmel High School	Mon	12/29/2014	4:45a	Mon	12/29/2014	7:20a	Adult Masters	2.58
Carmel High School	Tue	12/30/2014	4:45a	Tue	12/30/2014	7:20a	Adult Masters	2.58
Carmel High School	Wed	12/31/2014	4:45a	Wed	12/31/2014	7:21a	Adult Masters	2.6
Carmel High School	Fri	1/2/2015	4:45a	Fri	1/2/2015	7:21a	Adult Masters	2.6
Carmel High School	Mon	1/5/2015	4:45a	Mon	1/5/2015	7:21a	Adult Masters	2.6
Carmel High School	Tue	1/6/2015	4:45a	Tue	1/6/2015	7:21a	Adult Masters	2.6
Carmel High School	Wed	1/7/2015	4:45a	Wed	1/7/2015	7:21a	Adult Masters	2.6
Carmel High School	Thu	1/8/2015	4:45a	Thu	1/8/2015	7:21a	Adult Masters	2.6
Carmel High School	Fri	1/9/2015	4:45a	Fri	1/9/2015	7:21a	Adult Masters	2.6
Carmel High School	Mon	1/12/2015	4:45a	Mon	1/12/2015	7:21a	Adult Masters	2.6
Carmel High School	Tue	1/13/2015	4:45a	Tue	1/13/2015	7:20a	Adult Masters	2.58
Carmel High School	Wed	1/14/2015	4:45a	Wed	1/14/2015	7:20a	Adult Masters	2.58
Carmel High School	Thu	1/15/2015	4:45a	Thu	1/15/2015	7:20a	Adult Masters	2.58
Carmel High School	Fri	1/16/2015	4:45a	Fri	1/16/2015	7:20a	Adult Masters	2.58
Carmel High School	Tue	1/20/2015	4:45a	Tue	1/20/2015	7:18a	Adult Masters	2.55



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Carmel High School	Wed	1/21/2015	4:45a	Wed	1/21/2015	7:17a	Adult Masters	2.53
Carmel High School	Thu	1/22/2015	4:45a	Thu	1/22/2015	7:17a	Adult Masters	2.53
Carmel High School	Fri	1/23/2015	4:45a	Fri	1/23/2015	7:16a	Adult Masters	2.52
Carmel High School	Mon	1/26/2015	4:45a	Mon	1/26/2015	7:15a	Adult Masters	2.5
Carmel High School	Tue	1/27/2015	4:45a	Tue	1/27/2015	7:14a	Adult Masters	2.48
Carmel High School	Wed	1/28/2015	4:45a	Wed	1/28/2015	7:13a	Adult Masters	2.47
Carmel High School	Thu	1/29/2015	4:45a	Thu	1/29/2015	7:13a	Adult Masters	2.47
Carmel High School	Fri	1/30/2015	4:45a	Fri	1/30/2015	7:12a	Adult Masters	2.45
Carmel High School	Mon	2/2/2015	4:45a	Mon	2/2/2015	7:09a	Adult Masters	2.4
Carmel High School	Mon	2/2/2015	5:03p	Mon	2/2/2015	6:00p	Swim	0.95
Carmel High School	Tue	2/3/2015	5:04p	Tue	2/3/2015	6:00p	Swim	0.93
Carmel High School	Wed	2/4/2015	4:45a	Wed	2/4/2015	7:08a	Adult Masters	2.38
Carmel High School	Wed	2/4/2015	5:05p	Wed	2/4/2015	6:00p	Swim	0.92
Carmel High School	Thu	2/5/2015	5:06p	Thu	2/5/2015	6:00p	Swim	0.9
Carmel High School	Fri	2/6/2015	4:45a	Fri	2/6/2015	7:06a	Adult Masters	2.35
Carmel High School	Fri	2/6/2015	5:07p	Fri	2/6/2015	6:00p	Swim	0.88
Carmel High School	Mon	2/9/2015	4:45a	Mon	2/9/2015	7:03a	Adult Masters	2.3
Carmel High School	Mon	2/9/2015	5:11p	Mon	2/9/2015	6:00p	Swim	0.82
Carmel High School	Tue	2/10/2015	5:12p	Tue	2/10/2015	6:00p	Swim	0.8
Carmel High School	Wed	2/11/2015	4:45a	Wed	2/11/2015	7:01a	Adult Masters	2.27
Carmel High School	Wed	2/11/2015	5:13p	Wed	2/11/2015	6:00p	Swim	0.78
Carmel High School	Thu	2/12/2015	5:14p	Thu	2/12/2015	6:00p	Swim	0.77
Carmel High School	Fri	2/13/2015	4:45a	Fri	2/13/2015	6:59a	Adult Masters	2.23
Carmel High School	Fri	2/13/2015	5:15p	Fri	2/13/2015	6:00p	Swim	0.75
Carmel High School	Wed	2/18/2015	4:45a	Wed	2/18/2015	6:53a	Adult Masters	2.13
Carmel High School	Fri	2/20/2015	4:45a	Fri	2/20/2015	6:50a	Adult Masters	2.08
Carmel High School	Mon	2/23/2015	4:45a	Mon	2/23/2015	6:47a	Adult Masters	2.03
Carmel High School	Mon	2/23/2015	5:25p	Mon	2/23/2015	7:15p	Swim	1.83
Carmel High School	Tue	2/24/2015	5:26p	Tue	2/24/2015	8:15p	Swim	2.82
Carmel High School	Wed	2/25/2015	4:45a	Wed	2/25/2015	6:44a	Adult Masters	1.98
Carmel High School	Wed	2/25/2015	5:27p	Wed	2/25/2015	8:15p	Swim	2.8
Carmel High School	Thu	2/26/2015	5:28p	Thu	2/26/2015	8:15p	Swim	2.78
Carmel High School	Fri	2/27/2015	5:29p	Fri	2/27/2015	7:15p	Swim	1.77
Carmel High School	Fri	2/27/2015	4:45a	Fri	2/27/2015	6:41a	Adult Masters	1.93
Carmel High School	Mon	3/2/2015	5:32p	Mon	3/2/2015	8:15p	Swim	2.72
Carmel High School	Tue	3/3/2015	5:33p	Tue	3/3/2015	8:15p	Swim	2.7
Carmel High School	Wed	3/4/2015	5:34p	Wed	3/4/2015	8:15p	Swim	2.68
Carmel High School	Thu	3/5/2015	5:35p	Thu	3/5/2015	8:15p	Swim	2.67
Carmel High School	Fri	3/6/2015	5:36p	Fri	3/6/2015	7:15p	Swim	1.65
Carmel High School	Mon	3/9/2015	6:39p	Mon	3/9/2015	8:15p	Swim	1.6
Carmel High School	Tue	3/10/2015	6:40p	Tue	3/10/2015	8:15p	Swim	1.58
Carmel High School	Wed	3/11/2015	6:41p	Wed	3/11/2015	8:15p	Swim	1.57
Carmel High School	Thu	3/12/2015	6:41p	Thu	3/12/2015	8:15p	Swim	1.57
Carmel High School	Fri	3/13/2015	6:42p	Fri	3/13/2015	7:15p	Swim	0.55
Carmel High School	Mon	3/16/2015	6:45p	Mon	3/16/2015	8:15p	Swim	1.5
Carmel High School	Tue	3/17/2015	6:46p	Tue	3/17/2015	8:15p	Swim	1.48
Carmel High School	Wed	3/18/2015	6:47p	Wed	3/18/2015	8:15p	Swim	1.47
Carmel High School	Thu	3/19/2015	6:48p	Thu	3/19/2015	8:15p	Swim	1.45
Carmel High School	Fri	3/20/2015	6:49p	Fri	3/20/2015	7:15p	Swim	0.43
Carmel High School	Mon	3/23/2015	6:51p	Mon	3/23/2015	8:15p	Swim	1.4
Carmel High School	Tue	3/24/2015	6:52p	Tue	3/24/2015	8:15p	Swim	1.38
Carmel High School	Wed	3/25/2015	6:53p	Wed	3/25/2015	8:15p	Swim	1.37
Carmel High School	Thu	3/26/2015	6:54p	Thu	3/26/2015	8:15p	Swim	1.35
Carmel High School	Mon	3/30/2015	6:58p	Mon	3/30/2015	8:15p	Swim	1.28
Carmel High School	Tue	3/31/2015	6:58p	Tue	3/31/2015	8:15p	Swim	1.28
Carmel High School	Wed	4/1/2015	6:59p	Wed	4/1/2015	8:15p	Swim	1.27
Carmel High School	Thu	4/2/2015	7:00p	Thu	4/2/2015	8:15p	Swim	1.25
Carmel High School	Fri	4/3/2015	7:01p	Fri	4/3/2015	8:15p	Swim	1.23

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Carmel High School	Mon	4/13/2015	7:10p	Mon	4/13/2015	8:15p	Swim	1.08
Carmel High School	Tue	4/14/2015	7:11p	Tue	4/14/2015	8:15p	Swim	1.07
Carmel High School	Wed	4/15/2015	7:12p	Wed	4/15/2015	8:15p	Swim	1.05
Carmel High School	Thu	4/16/2015	7:13p	Thu	4/16/2015	8:15p	Swim	1.03
Carmel High School	Mon	4/20/2015	7:16p	Mon	4/20/2015	8:15p	Swim	0.98
Carmel High School	Tue	4/21/2015	7:17p	Tue	4/21/2015	8:15p	Swim	0.97
Carmel High School	Wed	4/22/2015	7:18p	Wed	4/22/2015	8:15p	Swim	0.95
Carmel High School	Thu	4/23/2015	7:19p	Thu	4/23/2015	8:15p	Swim	0.93
Carmel High School	Fri	4/24/2015	7:20p	Fri	4/24/2015	8:15p	Swim	0.92
Carmel High School	Mon	4/27/2015	7:22p	Mon	4/27/2015	8:15p	Swim	0.88
Carmel High School	Tue	4/28/2015	7:23p	Tue	4/28/2015	8:15p	Swim	0.87
Carmel High School	Wed	4/29/2015	7:24p	Wed	4/29/2015	8:15p	Swim	0.85
Carmel High School	Fri	9/4/2015	7:03p	Fri	9/4/2015	8:30p	Water Polo	1.45
Carmel High School	Tue	9/8/2015	6:57p	Tue	9/8/2015	7:50p	Water Polo	0.88
Carmel High School	Wed	9/9/2015	6:55p	Wed	9/9/2015	7:50p	Water Polo	0.92
Carmel High School	Thu	9/10/2015	6:54p	Thu	9/10/2015	7:50p	Water Polo	0.93
Carmel High School	Fri	9/11/2015	6:52p	Fri	9/11/2015	7:50p	Water Polo	0.97
Carmel High School	Mon	9/14/2015	6:48p	Mon	9/14/2015	7:50p	Water Polo	1.03
Carmel High School	Tue	9/15/2015	6:46p	Tue	9/15/2015	7:50p	Water Polo	1.07
Carmel High School	Wed	9/16/2015	6:45p	Wed	9/16/2015	7:50p	Water Polo	1.08
Carmel High School	Thu	9/17/2015	6:43p	Thu	9/17/2015	7:50p	Water Polo	1.12
Carmel High School	Fri	9/18/2015	6:42p	Fri	9/18/2015	7:50p	Water Polo	1.13
Carmel High School	Mon	9/21/2015	6:37p	Mon	9/21/2015	8:30p	Water Polo	1.88
Carmel High School	Tue	9/22/2015	6:35p	Tue	9/22/2015	7:50p	Water Polo	1.25
Carmel High School	Wed	9/23/2015	6:34p	Wed	9/23/2015	7:50p	Water Polo	1.27
Carmel High School	Thu	9/24/2015	6:32p	Thu	9/24/2015	9:00p	Water Polo	2.47
Carmel High School	Fri	9/25/2015	6:31p	Fri	9/25/2015	7:50p	Water Polo	1.32
Carmel High School	Mon	9/28/2015	6:26p	Mon	9/28/2015	7:50p	Water Polo	1.4
Carmel High School	Wed	9/30/2015	6:23p	Wed	9/30/2015	7:50p	Water Polo	1.45
Carmel High School	Thu	10/1/2015	6:22p	Thu	10/1/2015	8:00p	Water Polo	1.63
Carmel High School	Fri	10/2/2015	6:20p	Fri	10/2/2015	7:50p	Water Polo	1.5
Carmel High School	Mon	10/5/2015	6:16p	Mon	10/5/2015	7:50p	Water Polo	1.57
Carmel High School	Wed	10/7/2015	6:13p	Wed	10/7/2015	7:50p	Water Polo	1.62
Carmel High School	Thu	10/8/2015	6:12p	Thu	10/8/2015	9:00p	Water Polo	2.8
Carmel High School	Fri	10/9/2015	6:10p	Fri	10/9/2015	7:50p	Water Polo	1.67
Carmel High School	Tue	10/13/2015	6:04p	Tue	10/13/2015	7:15p	SAC	1.18
Carmel High School	Wed	10/14/2015	6:03p	Wed	10/14/2015	7:15p	SAC	1.2
Carmel High School	Thu	10/15/2015	6:02p	Thu	10/15/2015	7:45p	Water Polo	1.72
Carmel High School	Fri	10/16/2015	6:00p	Fri	10/16/2015	7:15p	SAC	1.25
Carmel High School	Mon	10/19/2015	5:56p	Mon	10/19/2015	7:50p	Water Polo	1.9
Carmel High School	Tue	10/20/2015	5:55p	Tue	10/20/2015	8:30p	Water Polo	2.58
Carmel High School	Wed	10/21/2015	5:54p	Wed	10/21/2015	7:50p	Water Polo	1.93
Carmel High School	Thu	10/22/2015	5:53p	Thu	10/22/2015	7:50p	Water Polo	1.95
Carmel High School	Fri	10/23/2015	5:51p	Fri	10/23/2015	8:45p	Water Polo	2.9
Carmel High School	Sat	10/24/2015	5:50p	Sat	10/24/2015	7:00p	Water Polo	1.17
Carmel High School	Mon	10/26/2015	5:48p	Mon	10/26/2015	7:50p	Water Polo	2.03
Carmel High School	Tue	10/27/2015	5:46p	Tue	10/27/2015	6:45p	Water Polo	0.98
Carmel High School	Wed	10/28/2015	5:45p	Wed	10/28/2015	7:50p	Water Polo	2.08
Carmel High School	Thu	10/29/2015	5:44p	Thu	10/29/2015	7:45p	Water Polo	2.02
Carmel High School	Fri	10/30/2015	5:43p	Fri	10/30/2015	8:45p	Water Polo	3.03
Carmel High School	Sat	10/31/2015	5:42p	Sat	10/31/2015	7:00p	Water Polo	1.3
Carmel High School	Mon	11/2/2015	4:40p	Mon	11/2/2015	7:50p	Water Polo	3.17
Carmel High School	Tue	11/3/2015	4:39p	Tue	11/3/2015	7:50p	Water Polo	3.18
Carmel High School	Wed	11/4/2015	4:38p	Wed	11/4/2015	7:50p	Water Polo	3.2
Carmel High School	Thu	11/5/2015	4:37p	Thu	11/5/2015	7:30p	Legacy WP	2.88
Carmel High School	Fri	11/6/2015	4:36p	Fri	11/6/2015	7:50p	Water Polo	3.23
Carmel High School	Sat	11/7/2015	4:35p	Sat	11/7/2015	7:00p	Water Polo	2.42
Carmel High School	Tue	11/10/2015	4:32p	Tue	11/10/2015	6:00p	Water Polo	1.47



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Carmel High School	Fri	11/13/2015	4:30p	Fri	11/13/2015	5:45p	Water Polo	1.25
Carmel High School	Mon	11/16/2015	4:28p	Mon	11/16/2015	6:00p	Water Polo	1.53
Carmel High School	Mon	12/14/2015	5:30p	Mon	12/14/2015	8:15p	SAC	2.75
Carmel High School	Tue	12/15/2015	5:45p	Tue	12/15/2015	8:15p	SAC	2.5
Carmel High School	Wed	12/16/2015	1:00p	Wed	12/16/2015	1:30p		0.5
Carmel High School	Wed	12/16/2015	5:15p	Wed	12/16/2015	8:15p	SAC	3
Carmel High School	Thu	12/17/2015	5:45p	Thu	12/17/2015	8:15p	SAC	2.5
Carmel High School	Fri	12/18/2015	5:15p	Fri	12/18/2015	8:15p	SAC	3
Carmel High School	Mon	1/4/2016	5:15p	Mon	1/4/2016	8:15p	SAC	3
Carmel High School	Tue	1/5/2016	5:45p	Tue	1/5/2016	8:15p	SAC	2.5
Carmel High School	Wed	1/6/2016	5:15p	Wed	1/6/2016	8:15p	SAC	3
Carmel High School	Thu	1/7/2016	5:45p	Thu	1/7/2016	8:15p	SAC	2.5
Carmel High School	Fri	1/8/2016	5:15p	Fri	1/8/2016	8:15p	SAC	3
Carmel High School	Mon	1/11/2016	5:15p	Mon	1/11/2016	8:15p	SAC	3
Carmel High School	Tue	1/12/2016	5:45p	Tue	1/12/2016	8:15p	SAC	2.5
Carmel High School	Wed	1/13/2016	5:15p	Wed	1/13/2016	8:15p	SAC	3
Carmel High School	Thu	1/14/2016	5:45p	Thu	1/14/2016	8:15p	SAC	2.5
Carmel High School	Fri	1/15/2016	5:15p	Fri	1/15/2016	8:15p	SAC	3
Carmel High School	Tue	1/19/2016	5:45p	Tue	1/19/2016	8:15p	SAC	2.5
Carmel High School	Wed	1/20/2016	5:15p	Wed	1/20/2016	8:15p	SAC	3
Carmel High School	Thu	1/21/2016	5:45p	Thu	1/21/2016	8:15p	SAC	2.5
Carmel High School	Fri	1/22/2016	5:15p	Fri	1/22/2016	8:15p	SAC	3
Carmel High School	Mon	1/25/2016	5:15p	Mon	1/25/2016	8:15p	SAC	3
Carmel High School	Tue	1/26/2016	5:45p	Tue	1/26/2016	8:15p	SAC	2.5
Carmel High School	Wed	1/27/2016	5:15p	Wed	1/27/2016	8:15p	SAC	3
Carmel High School	Thu	1/28/2016	5:45p	Thu	1/28/2016	8:15p	SAC	2.5
Carmel High School	Fri	1/29/2016	5:15p	Fri	1/29/2016	8:15p	SAC	3
Carmel High School	Mon	2/1/2016	6:01p	Mon	2/1/2016	8:20p		2.32
Carmel High School	Tue	2/2/2016	5:03p	Tue	2/2/2016	7:45p		2.7
Carmel High School	Wed	2/3/2016	5:04p	Wed	2/3/2016	7:45p		2.68
Carmel High School	Thu	2/4/2016	5:05p	Thu	2/4/2016	7:45p		2.67
Carmel High School	Fri	2/5/2016	5:06p	Fri	2/5/2016	7:45p		2.65
Carmel High School	Mon	2/8/2016	5:09p	Mon	2/8/2016	7:45p		2.6
Carmel High School	Tue	2/9/2016	5:10p	Tue	2/9/2016	7:45p		2.58
Carmel High School	Wed	2/10/2016	5:11p	Wed	2/10/2016	7:45p		2.57
Carmel High School	Thu	2/11/2016	5:12p	Thu	2/11/2016	7:45p		2.55
Carmel High School	Fri	2/12/2016	5:13p	Fri	2/12/2016	7:45p		2.53
Carmel High School	Tue	2/16/2016	5:18p	Tue	2/16/2016	7:45p		2.45
Carmel High School	Wed	2/17/2016	5:19p	Wed	2/17/2016	7:45p		2.43
Carmel High School	Thu	2/18/2016	5:20p	Thu	2/18/2016	7:45p		2.42
Carmel High School	Fri	2/19/2016	5:21p	Fri	2/19/2016	7:45p		2.4
Carmel High School	Mon	2/22/2016	5:24p	Mon	2/22/2016	7:45p		2.35
Carmel High School	Tue	2/23/2016	5:25p	Tue	2/23/2016	7:45p		2.33
Carmel High School	Wed	2/24/2016	5:26p	Wed	2/24/2016	7:45p		2.32
Carmel High School	Thu	2/25/2016	5:27p	Thu	2/25/2016	7:45p		2.3
Carmel High School	Fri	2/26/2016	5:28p	Fri	2/26/2016	7:45p		2.28
Carmel High School	Mon	2/29/2016	5:31p	Mon	2/29/2016	7:45p		2.23
Carmel High School	Tue	3/1/2016	5:32p	Tue	3/1/2016	7:45p		2.22
Carmel High School	Wed	3/2/2016	5:33p	Wed	3/2/2016	7:45p		2.2
Carmel High School	Thu	3/3/2016	5:34p	Thu	3/3/2016	7:45p		2.18
Carmel High School	Fri	3/4/2016	5:35p	Fri	3/4/2016	6:30p	Swim	0.92
Carmel High School	Mon	3/7/2016	5:37p	Mon	3/7/2016	7:45p		2.13
Carmel High School	Tue	3/8/2016	5:38p	Tue	3/8/2016	7:45p		2.12
Carmel High School	Wed	3/9/2016	5:39p	Wed	3/9/2016	7:45p		2.1
Carmel High School	Thu	3/10/2016	5:40p	Thu	3/10/2016	7:45p		2.08
Carmel High School	Fri	3/11/2016	5:41p	Fri	3/11/2016	7:45p		2.07
Carmel High School	Mon	3/14/2016	6:44p	Mon	3/14/2016	7:45p		1.02
Carmel High School	Tue	3/15/2016	6:45p	Tue	3/15/2016	7:45p		1

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con't.

Carmel High School	Wed	3/16/2016	6:46p	Wed	3/16/2016	7:45p		0.98
Carmel High School	Thu	3/17/2016	6:47p	Thu	3/17/2016	7:45p		0.97
Carmel High School	Mon	3/21/2016	6:50p	Mon	3/21/2016	7:45p		0.92
Carmel High School	Tue	3/22/2016	6:51p	Tue	3/22/2016	7:45p		0.9
Carmel High School	Wed	3/23/2016	6:52p	Wed	3/23/2016	7:45p		0.88
Carmel High School	Thu	3/24/2016	6:53p	Thu	3/24/2016	7:45p		0.87
Carmel High School	Fri	3/25/2016	6:54p	Fri	3/25/2016	7:45p		0.85
Carmel High School	Mon	3/28/2016	6:56p	Mon	3/28/2016	7:45p		0.82
Carmel High School	Tue	3/29/2016	6:57p	Tue	3/29/2016	7:45p		0.8
Carmel High School	Wed	3/30/2016	6:58p	Wed	3/30/2016	7:45p		0.78
Carmel High School	Thu	3/31/2016	6:59p	Thu	3/31/2016	7:45p		0.77
Carmel High School	Mon	4/4/2016	7:03p	Mon	4/4/2016	7:45p		0.7
Carmel High School	Tue	4/5/2016	7:04p	Tue	4/5/2016	7:45p		0.68
Carmel High School	Thu	4/7/2016	7:05p	Thu	4/7/2016	7:45p		0.67
Carmel High School	Mon	4/11/2016	7:09p	Mon	4/11/2016	7:45p		0.6
Carmel High School	Tue	4/12/2016	7:10p	Tue	4/12/2016	7:45p		0.58
Carmel High School	Wed	4/13/2016	7:11p	Wed	4/13/2016	7:45p		0.57
Carmel High School	Thu	4/14/2016	7:11p	Thu	4/14/2016	7:45p		0.57
Carmel High School	Mon	8/29/2016	7:10p	Mon	8/29/2016	7:50p	Water Polo	0.67
Carmel High School	Tue	8/30/2016	7:09p	Tue	8/30/2016	9:00p		1.85
Carmel High School	Wed	8/31/2016	7:07p	Wed	8/31/2016	7:50p	Water Polo	0.72
Carmel High School	Mon	9/5/2016	7:00p	Mon	9/5/2016	7:50p	Water Polo	0.83
Carmel High School	Tue	9/6/2016	6:59p	Tue	9/6/2016	8:00p		1.02
Carmel High School	Wed	9/7/2016	6:57p	Wed	9/7/2016	7:50p	Water Polo	0.88
Carmel High School	Thu	9/8/2016	6:56p	Thu	9/8/2016	7:50p	Water Polo	0.9
Carmel High School	Fri	9/9/2016	6:54p	Fri	9/9/2016	7:50p	Water Polo	0.93
Carmel High School	Mon	9/12/2016	6:50p	Mon	9/12/2016	7:50p	Water Polo	1
Carmel High School	Tue	9/13/2016	6:48p	Tue	9/13/2016	7:50p	Water Polo	1.03
Carmel High School	Wed	9/14/2016	6:47p	Wed	9/14/2016	7:50p	Water Polo	1.05
Carmel High School	Thu	9/15/2016	6:45p	Thu	9/15/2016	7:50p	Water Polo	1.08
Carmel High School	Fri	9/16/2016	6:43p	Fri	9/16/2016	7:50p	Water Polo	1.12
Carmel High School	Mon	9/19/2016	6:39p	Mon	9/19/2016	7:50p	Water Polo	1.18
Carmel High School	Tue	9/20/2016	6:37p	Tue	9/20/2016	8:00p		1.38
Carmel High School	Wed	9/21/2016	6:36p	Wed	9/21/2016	7:50p	Water Polo	1.23
Carmel High School	Thu	9/22/2016	6:34p	Thu	9/22/2016	8:00p		1.43
Carmel High School	Mon	9/26/2016	6:28p	Mon	9/26/2016	7:50p	Water Polo	1.37
Carmel High School	Wed	9/28/2016	6:25p	Wed	9/28/2016	7:50p	Water Polo	1.42
Carmel High School	Thu	9/29/2016	6:24p	Thu	9/29/2016	8:00p		1.6
Carmel High School	Mon	10/3/2016	6:18p	Mon	10/3/2016	7:50p	Water Polo	1.53
Carmel High School	Tue	10/4/2016	6:16p	Tue	10/4/2016	8:45p	Water Polo	2.48
Carmel High School	Wed	10/5/2016	6:15p	Wed	10/5/2016	7:50p	Water Polo	1.58
Carmel High School	Thu	10/6/2016	6:13p	Thu	10/6/2016	7:50p	Water Polo	1.62
Carmel High School	Thu	10/13/2016	6:03p	Thu	10/13/2016	7:30p		1.45
Carmel High School	Fri	10/14/2016	6:02p	Fri	10/14/2016	9:00p	Water Polo	2.97
Carmel High School	Mon	10/17/2016	5:58p	Mon	10/17/2016	7:50p	Water Polo	1.87
Carmel High School	Tue	10/18/2016	5:57p	Tue	10/18/2016	8:00p		2.05
Carmel High School	Wed	10/19/2016	5:55p	Wed	10/19/2016	7:50p	Water Polo	1.92
Carmel High School	Thu	10/20/2016	5:54p	Thu	10/20/2016	7:50p	Water Polo	1.93
Carmel High School	Fri	10/21/2016	5:53p	Fri	10/21/2016	9:00p	Water Polo	3.12
Carmel High School	Mon	10/24/2016	5:49p	Mon	10/24/2016	7:50p	Water Polo	2.02
Carmel High School	Tue	10/25/2016	5:48p	Tue	10/25/2016	7:50p	Water Polo	2.03
Carmel High School	Wed	10/26/2016	5:47p	Wed	10/26/2016	7:50p	Water Polo	2.05
Carmel High School	Thu	10/27/2016	5:46p	Thu	10/27/2016	10:15p	Water Polo	4.48
Carmel High School	Fri	10/28/2016	5:44p	Fri	10/28/2016	7:50p	Water Polo	2.1
Carmel High School	Mon	10/31/2016	5:41p	Mon	10/31/2016	7:50p	Water Polo	2.15
Carmel High School	Tue	11/1/2016	5:40p	Tue	11/1/2016	7:50p	Water Polo	2.17
Carmel High School	Wed	11/2/2016	5:39p	Wed	11/2/2016	7:50p	Water Polo	2.18
Carmel High School	Thu	11/3/2016	5:38p	Thu	11/3/2016	7:50p	Water Polo	2.2

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Carmel High School	Fri	11/4/2016	5:37p	Fri	11/4/2016	7:50p	Water Polo	2.22
Carmel High School	Tue	11/8/2016	4:33p	Tue	11/8/2016	7:00p		2.45
Carmel High School	Mon	11/14/2016	4:28p	Mon	11/14/2016	8:15p	Legacy WP	3.78
Carmel High School	Tue	11/15/2016	4:28p	Tue	11/15/2016	7:15p	SAC	2.78
Carmel High School	Wed	11/16/2016	4:27p	Wed	11/16/2016	8:15p	Legacy WP	3.8
Carmel High School	Thu	11/17/2016	4:26p	Thu	11/17/2016	6:45p	SAC	2.32
Carmel High School	Fri	11/18/2016	4:26p	Fri	11/18/2016	6:45p	SAC	2.32
Carmel High School	Mon	11/21/2016	4:24p	Mon	11/21/2016	7:15p	Legacy WP	2.85
Carmel High School	Tue	11/22/2016	4:24p	Tue	11/22/2016	7:15p	SAC	2.85
Carmel High School	Wed	11/23/2016	4:23p	Wed	11/23/2016	7:15p	Legacy WP	2.87
Carmel High School	Mon	11/28/2016	4:21p	Mon	11/28/2016	8:15p	Legacy WP	3.9
Carmel High School	Tue	11/29/2016	4:21p	Tue	11/29/2016	7:15p	SAC	2.9
Carmel High School	Wed	11/30/2016	4:21p	Wed	11/30/2016	8:15p	Legacy WP	3.9
Carmel High School	Thu	12/1/2016	4:21p	Thu	12/1/2016	6:45p	SAC	2.4
Carmel High School	Fri	12/2/2016	4:21p	Fri	12/2/2016	6:45p	SAC	2.4
Carmel High School	Mon	12/5/2016	4:20p	Mon	12/5/2016	8:15p	Legacy WP	3.92
Carmel High School	Tue	12/6/2016	4:20p	Tue	12/6/2016	7:15p	SAC	2.92
Carmel High School	Wed	12/7/2016	4:20p	Wed	12/7/2016	8:15p	Legacy WP	3.92
Carmel High School	Thu	12/8/2016	4:21p	Thu	12/8/2016	6:45p	SAC	2.4
Carmel High School	Fri	12/9/2016	4:21p	Fri	12/9/2016	6:45p	SAC	2.4
Carmel High School	Mon	12/12/2016	4:21p	Mon	12/12/2016	8:15p	Legacy WP	3.9
Carmel High School	Tue	12/13/2016	4:21p	Tue	12/13/2016	7:15p	SAC	2.9
Carmel High School	Wed	12/14/2016	4:22p	Wed	12/14/2016	8:15p	Legacy WP	3.88
Carmel High School	Thu	12/15/2016	4:22p	Thu	12/15/2016	6:45p	SAC	2.38
Carmel High School	Fri	12/16/2016	4:22p	Fri	12/16/2016	6:45p	SAC	2.38
Carmel High School	Mon	12/19/2016	4:23p	Mon	12/19/2016	8:15p	Legacy WP	3.87
Carmel High School	Tue	12/20/2016	4:24p	Tue	12/20/2016	7:15p	SAC	2.85
Carmel High School	Wed	12/21/2016	4:24p	Wed	12/21/2016	8:15p	Legacy WP	3.85
Carmel High School	Thu	12/22/2016	4:25p	Thu	12/22/2016	6:45p	SAC	2.33
Carmel High School	Mon	1/2/2017	4:32p	Mon	1/2/2017	8:15p	Legacy WP	3.72
Carmel High School	Tue	1/3/2017	4:33p	Tue	1/3/2017	7:15p	SAC	2.7
Carmel High School	Wed	1/4/2017	4:34p	Wed	1/4/2017	8:15p	Legacy WP	3.68
Carmel High School	Thu	1/5/2017	4:35p	Thu	1/5/2017	6:45p	SAC	2.17
Carmel High School	Fri	1/6/2017	4:36p	Fri	1/6/2017	6:45p	SAC	2.15
Carmel High School	Mon	1/9/2017	4:38p	Mon	1/9/2017	8:15p	Legacy WP	3.62
Carmel High School	Tue	1/10/2017	4:39p	Tue	1/10/2017	7:15p	SAC	2.6
Carmel High School	Wed	1/11/2017	4:40p	Wed	1/11/2017	8:15p	Legacy WP	3.58
Carmel High School	Thu	1/12/2017	4:41p	Thu	1/12/2017	6:45p	SAC	2.07
Carmel High School	Fri	1/13/2017	4:42p	Fri	1/13/2017	6:45p	SAC	2.05
Carmel High School	Tue	1/17/2017	4:46p	Tue	1/17/2017	7:15p	SAC	2.48
Carmel High School	Wed	1/18/2017	4:47p	Wed	1/18/2017	8:15p	Legacy WP	3.47
Carmel High School	Thu	1/19/2017	4:48p	Thu	1/19/2017	6:45p	SAC	1.95
Carmel High School	Fri	1/20/2017	4:49p	Fri	1/20/2017	6:45p	SAC	1.93
Carmel High School	Mon	1/23/2017	4:53p	Mon	1/23/2017	8:15p	Legacy WP	3.37
Carmel High School	Tue	1/24/2017	4:54p	Tue	1/24/2017	7:15p	SAC	2.35
Carmel High School	Wed	1/25/2017	4:55p	Wed	1/25/2017	8:15p	Legacy WP	3.33
Carmel High School	Thu	1/26/2017	4:56p	Thu	1/26/2017	6:45p	SAC	1.82
Carmel High School	Fri	1/27/2017	4:57p	Fri	1/27/2017	6:45p	SAC	1.8
Carmel High School	Mon	1/30/2017	5:00p	Mon	1/30/2017	8:15p	Legacy WP	3.25
Carmel High School	Tue	1/31/2017	5:01p	Tue	1/31/2017	8:15p	SAC	3.23
Carmel High School	Wed	2/1/2017	5:02p	Wed	2/1/2017	8:15p	Swim	3.22
Carmel High School	Thu	2/2/2017	5:04p	Thu	2/2/2017	8:15p	Swim	3.18
Carmel High School	Fri	2/3/2017	5:05p	Fri	2/3/2017	8:15p	Swim	3.17
Carmel High School	Mon	2/6/2017	5:08p	Mon	2/6/2017	8:15p	Swim	3.12
Carmel High School	Tue	2/7/2017	5:09p	Tue	2/7/2017	8:15p	Swim	3.1
Carmel High School	Wed	2/8/2017	5:10p	Wed	2/8/2017	8:15p	Swim	3.08
Carmel High School	Fri	2/10/2017	5:12p	Fri	2/10/2017	8:15p	Swim	3.05
Carmel High School	Mon	2/13/2017	5:15p	Mon	2/13/2017	8:15p	Swim	3

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Carmel High School	Tue	2/14/2017	5:16p	Tue	2/14/2017	8:15p	Swim	2.98
Carmel High School	Wed	2/15/2017	5:17p	Wed	2/15/2017	8:15p	Swim	2.97
Carmel High School	Thu	2/16/2017	5:18p	Thu	2/16/2017	8:15p	Swim	2.95
Carmel High School	Fri	2/17/2017	5:20p	Fri	2/17/2017	8:15p	Swim	2.92
Carmel High School	Tue	2/21/2017	5:24p	Tue	2/21/2017	8:15p	Swim	2.85
Carmel High School	Wed	2/22/2017	5:25p	Wed	2/22/2017	8:15p	Swim	2.83
Carmel High School	Thu	2/23/2017	5:26p	Thu	2/23/2017	8:15p	Swim	2.82
Carmel High School	Fri	2/24/2017	5:27p	Fri	2/24/2017	8:15p	Swim	2.8
Carmel High School	Mon	2/27/2017	5:30p	Mon	2/27/2017	8:15p	Swim	2.75
Carmel High School	Tue	2/28/2017	5:31p	Tue	2/28/2017	8:15p	Swim	2.73
Carmel High School	Wed	3/1/2017	5:32p	Wed	3/1/2017	8:15p	Swim	2.72
Carmel High School	Thu	3/2/2017	5:32p	Thu	3/2/2017	8:15p	Swim	2.72
Carmel High School	Fri	3/3/2017	5:33p	Fri	3/3/2017	7:00p	Swim	1.45
Carmel High School	Mon	3/6/2017	5:36p	Mon	3/6/2017	8:15p	Swim	2.65
Carmel High School	Tue	3/7/2017	5:37p	Tue	3/7/2017	8:15p	Swim	2.63
Carmel High School	Wed	3/8/2017	5:38p	Wed	3/8/2017	8:15p	Swim	2.62
Carmel High School	Thu	3/9/2017	5:39p	Thu	3/9/2017	8:15p	Swim	2.6
Carmel High School	Fri	3/10/2017	5:40p	Fri	3/10/2017	8:15p	Swim	2.58
Carmel High School	Mon	3/13/2017	6:43p	Mon	3/13/2017	8:15p	Swim	1.53
Carmel High School	Tue	3/14/2017	6:44p	Tue	3/14/2017	8:15p	Swim	1.52
Carmel High School	Wed	3/15/2017	6:45p	Wed	3/15/2017	8:15p	Swim	1.5
Carmel High School	Thu	3/16/2017	6:46p	Thu	3/16/2017	8:15p	Swim	1.48
Carmel High School	Fri	3/17/2017	6:46p	Fri	3/17/2017	8:15p	Swim	1.48
Carmel High School	Mon	3/20/2017	6:49p	Mon	3/20/2017	8:15p	Swim	1.43
Carmel High School	Tue	3/21/2017	6:50p	Tue	3/21/2017	8:15p	Swim	1.42
Carmel High School	Wed	3/22/2017	6:51p	Wed	3/22/2017	8:15p	Swim	1.4
Carmel High School	Thu	3/23/2017	6:52p	Thu	3/23/2017	8:15p	Swim	1.38
Carmel High School	Fri	3/24/2017	6:53p	Fri	3/24/2017	7:00p		0.12
Carmel High School	Fri	3/24/2017	7:00p	Fri	3/24/2017	8:15p	Swim	1.25
Carmel High School	Mon	3/27/2017	6:55p	Mon	3/27/2017	8:15p	Swim	1.33
Carmel High School	Tue	3/28/2017	6:56p	Tue	3/28/2017	8:15p	Swim	1.32
Carmel High School	Wed	3/29/2017	6:57p	Wed	3/29/2017	8:15p	Swim	1.3
Carmel High School	Thu	3/30/2017	6:58p	Thu	3/30/2017	8:15p	Swim	1.28
Carmel High School	Fri	3/31/2017	6:59p	Fri	3/31/2017	8:15p	Swim	1.27
Carmel High School	Mon	4/3/2017	7:02p	Mon	4/3/2017	8:15p	Swim	1.22
Carmel High School	Tue	4/4/2017	7:02p	Tue	4/4/2017	8:15p	Swim	1.22
Carmel High School	Wed	4/5/2017	7:03p	Wed	4/5/2017	8:15p	Swim	1.2
Carmel High School	Thu	4/6/2017	7:04p	Thu	4/6/2017	8:15p	Swim	1.18
Carmel High School	Fri	4/7/2017	7:05p	Fri	4/7/2017	8:15p	SAC	1.17
Carmel High School	Mon	4/10/2017	7:08p	Mon	4/10/2017	8:15p	Swim	1.12
Carmel High School	Tue	4/11/2017	7:09p	Tue	4/11/2017	8:15p	Swim	1.1
Carmel High School	Wed	4/12/2017	7:09p	Wed	4/12/2017	8:15p	Swim	1.1
Carmel High School	Thu	4/13/2017	7:10p	Thu	4/13/2017	8:15p	Swim	1.08
Carmel High School	Mon	4/17/2017	7:14p	Mon	4/17/2017	8:15p	Swim	1.02
Carmel High School	Tue	4/18/2017	7:15p	Tue	4/18/2017	8:15p	Swim	1
Carmel High School	Wed	4/19/2017	7:16p	Wed	4/19/2017	8:15p	Swim	0.98
Carmel High School	Thu	4/20/2017	7:17p	Thu	4/20/2017	8:15p	Swim	0.97
Carmel High School	Fri	4/21/2017	7:17p	Fri	4/21/2017	8:15p	SAC	0.97
Carmel High School	Mon	4/24/2017	7:20p	Mon	4/24/2017	8:15p	Swim	0.92
Carmel High School	Tue	4/25/2017	7:21p	Tue	4/25/2017	8:15p	Swim	0.9
Carmel High School	Wed	4/26/2017	7:22p	Wed	4/26/2017	8:15p	Swim	0.88
Carmel High School	Thu	4/27/2017	7:23p	Thu	4/27/2017	8:15p	Swim	0.87
Carmel High School	Fri	4/28/2017	7:24p	Fri	4/28/2017	8:15p	SAC	0.85
Carmel High School	Mon	5/1/2017	7:26p	Mon	5/1/2017	8:15p	Swim	0.82
Carmel High School	Tue	5/2/2017	7:27p	Tue	5/2/2017	8:15p	Swim	0.8
Carmel High School	Wed	5/3/2017	7:28p	Wed	5/3/2017	8:15p	Swim	0.78
Carmel High School	Thu	5/4/2017	7:29p	Thu	5/4/2017	8:15p	Swim	0.77
Carmel High School	Mon	5/8/2017	7:32p	Mon	5/8/2017	8:15p	Swim	0.72



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Carmel High School	Tue	5/9/2017	7:33p	Tue	5/9/2017	8:15p	Swim	0.7
Carmel High School	Wed	5/10/2017	7:34p	Wed	5/10/2017	8:15p	Swim	0.68
Carmel High School	Thu	5/11/2017	7:35p	Thu	5/11/2017	8:15p	Swim	0.67
Carmel High School	Mon	5/15/2017	7:39p	Mon	5/15/2017	8:15p	Swim	0.6
Carmel High School	Tue	5/16/2017	7:39p	Tue	5/16/2017	8:15p	Swim	0.6
Carmel High School	Wed	5/17/2017	7:40p	Wed	5/17/2017	8:15p	Swim	0.58
Carmel High School	Thu	5/18/2017	7:41p	Thu	5/18/2017	8:15p	Swim	0.57
Carmel High School	Mon	8/28/2017	7:12p	Mon	8/28/2017	7:50p	Water Polo	0.63
Carmel High School	Tue	8/29/2017	7:11p	Tue	8/29/2017	7:50p	Water Polo	0.65
Carmel High School	Wed	8/30/2017	7:09p	Wed	8/30/2017	7:50p	Water Polo	0.68
Carmel High School	Fri	9/1/2017	7:06p	Fri	9/1/2017	7:50p	Water Polo	0.73
Carmel High School	Tue	9/5/2017	7:00p	Tue	9/5/2017	7:50p	Water Polo	0.83
Carmel High School	Wed	9/6/2017	6:59p	Wed	9/6/2017	7:50p	Water Polo	0.85
Carmel High School	Fri	9/8/2017	6:56p	Fri	9/8/2017	7:50p	Water Polo	0.9
Carmel High School	Mon	9/11/2017	6:51p	Mon	9/11/2017	7:50p	Water Polo	0.98
Carmel High School	Tue	9/12/2017	6:50p	Tue	9/12/2017	7:50p	Water Polo	1
Carmel High School	Wed	9/13/2017	6:48p	Wed	9/13/2017	7:30p	Water Polo	0.7
Carmel High School	Wed	9/13/2017	7:30p	Wed	9/13/2017	9:20p	Water Polo	1.83
Carmel High School	Thu	9/14/2017	6:47p	Thu	9/14/2017	8:30p	Water Polo	1.72
Carmel High School	Fri	9/15/2017	6:45p	Fri	9/15/2017	7:50p	Water Polo	1.08
Carmel High School	Mon	9/18/2017	6:41p	Mon	9/18/2017	7:50p	Water Polo	1.15
Carmel High School	Tue	9/19/2017	6:39p	Tue	9/19/2017	8:30p	Water Polo	1.85
Carmel High School	Wed	9/20/2017	6:38p	Wed	9/20/2017	7:50p	Water Polo	1.2
Carmel High School	Fri	9/22/2017	6:35p	Fri	9/22/2017	7:50p	Water Polo	1.25
Carmel High School	Mon	9/25/2017	6:30p	Mon	9/25/2017	7:50p	Water Polo	1.33
Carmel High School	Tue	9/26/2017	6:29p	Tue	9/26/2017	9:00p		2.52
Carmel High School	Wed	9/27/2017	6:27p	Wed	9/27/2017	7:50p	Water Polo	1.38
Carmel High School	Thu	9/28/2017	6:26p	Thu	9/28/2017	8:30p	Water Polo	2.07
Carmel High School	Fri	9/29/2017	6:24p	Fri	9/29/2017	7:50p	Water Polo	1.43
Carmel High School	Mon	10/2/2017	6:20p	Mon	10/2/2017	7:50p	Water Polo	1.5
Carmel High School	Wed	10/4/2017	6:17p	Wed	10/4/2017	7:50p	Water Polo	1.55
Carmel High School	Thu	10/5/2017	6:15p	Thu	10/5/2017	7:50p	Water Polo	1.58
Carmel High School	Fri	10/6/2017	6:14p	Fri	10/6/2017	7:50p	Water Polo	1.6
Carmel High School	Mon	10/9/2017	6:09p	Mon	10/9/2017	7:50p	Water Polo	1.68
Carmel High School	Thu	10/12/2017	6:05p	Thu	10/12/2017	7:50p	Water Polo	1.75
Carmel High School	Fri	10/13/2017	6:04p	Fri	10/13/2017	7:30p	Water Polo	1.43
Carmel High School	Mon	10/16/2017	6:00p	Mon	10/16/2017	7:50p	Water Polo	1.83
Carmel High School	Tue	10/17/2017	5:58p	Tue	10/17/2017	9:00p	Water Polo	3.03
Carmel High School	Wed	10/18/2017	5:57p	Wed	10/18/2017	7:50p	Water Polo	1.88
Carmel High School	Fri	10/20/2017	5:54p	Fri	10/20/2017	7:50p	Water Polo	1.93
Carmel High School	Sat	10/21/2017	5:53p	Sat	10/21/2017	9:00p	Water Polo	3.12
Carmel High School	Mon	10/23/2017	5:51p	Mon	10/23/2017	7:50p	Water Polo	1.98
Carmel High School	Tue	10/24/2017	5:49p	Tue	10/24/2017	7:50p	Water Polo	2.02
Carmel High School	Wed	10/25/2017	5:48p	Wed	10/25/2017	7:50p	Water Polo	2.03
Carmel High School	Thu	10/26/2017	5:47p	Thu	10/26/2017	8:45p	Water Polo	2.97
Carmel High School	Fri	10/27/2017	5:46p	Fri	10/27/2017	7:50p	Water Polo	2.07
Carmel High School	Mon	10/30/2017	5:42p	Mon	10/30/2017	7:50p	Water Polo	2.13
Carmel High School	Tue	10/31/2017	5:41p	Tue	10/31/2017	7:50p	Water Polo	2.15
Carmel High School	Wed	11/1/2017	5:40p	Wed	11/1/2017	7:50p	Water Polo	2.17
Carmel High School	Thu	11/2/2017	5:39p	Thu	11/2/2017	7:50p	Water Polo	2.18
Carmel High School	Fri	11/3/2017	5:38p	Fri	11/3/2017	7:50p	Water Polo	2.2
Carmel High School	Mon	11/13/2017	4:29p	Mon	11/13/2017	7:30p	SAC	3.02
Carmel High School	Tue	11/14/2017	4:29p	Tue	11/14/2017	7:30p	SAC	3.02
Carmel High School	Wed	11/15/2017	4:28p	Wed	11/15/2017	7:30p	SAC	3.03
Carmel High School	Thu	11/16/2017	4:27p	Thu	11/16/2017	7:30p	SAC	3.05
Carmel High School	Mon	11/20/2017	4:25p	Mon	11/20/2017	7:30p	SAC	3.08
Carmel High School	Tue	11/21/2017	4:24p	Tue	11/21/2017	7:30p	SAC	3.1
Carmel High School	Wed	11/22/2017	4:24p	Wed	11/22/2017	7:30p	SAC	3.1

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Carmel High School	Mon	11/27/2017	4:22p	Mon	11/27/2017	8:30p	Legacy WP	4.13
Carmel High School	Tue	11/28/2017	4:22p	Tue	11/28/2017	7:30p	SAC	3.13
Carmel High School	Wed	11/29/2017	4:21p	Wed	11/29/2017	8:30p	Legacy WP	4.15
Carmel High School	Thu	11/30/2017	4:21p	Thu	11/30/2017	7:30p	SAC	3.15
Carmel High School	Mon	12/4/2017	4:21p	Mon	12/4/2017	8:30p	Legacy WP	4.15
Carmel High School	Tue	12/5/2017	4:20p	Tue	12/5/2017	7:30p	SAC	3.17
Carmel High School	Wed	12/6/2017	4:20p	Wed	12/6/2017	8:30p	Legacy WP	4.17
Carmel High School	Thu	12/7/2017	4:20p	Thu	12/7/2017	7:30p	SAC	3.17
Carmel High School	Mon	12/11/2017	4:21p	Mon	12/11/2017	8:30p	Legacy WP	4.15
Carmel High School	Tue	12/12/2017	4:21p	Tue	12/12/2017	7:30p	SAC	3.15
Carmel High School	Wed	12/13/2017	4:21p	Wed	12/13/2017	8:30p	Legacy WP	4.15
Carmel High School	Thu	12/14/2017	4:22p	Thu	12/14/2017	7:30p	SAC	3.13
Carmel High School	Mon	12/18/2017	4:23p	Mon	12/18/2017	8:30p	Legacy WP	4.12
Carmel High School	Tue	12/19/2017	4:23p	Tue	12/19/2017	7:30p	SAC	3.12
Carmel High School	Wed	12/20/2017	4:24p	Wed	12/20/2017	8:30p	Legacy WP	4.1
Carmel High School	Thu	12/21/2017	4:24p	Thu	12/21/2017	7:30p	SAC	3.1
Carmel High School	Fri	12/22/2017	4:55p	Fri	12/22/2017	6:30p		1.58
Carmel High School	Tue	1/2/2018	4:32p	Tue	1/2/2018	7:30p	SAC	2.97
Carmel High School	Wed	1/3/2018	4:33p	Wed	1/3/2018	8:30p		3.95
Carmel High School	Thu	1/4/2018	4:34p	Thu	1/4/2018	7:30p	SAC	2.93
Carmel High School	Fri	1/5/2018	4:35p	Fri	1/5/2018	6:20p	SAC	1.75
Carmel High School	Mon	1/8/2018	4:37p	Mon	1/8/2018	8:30p		3.88
Carmel High School	Tue	1/9/2018	4:38p	Tue	1/9/2018	7:30p	SAC	2.87
Carmel High School	Wed	1/10/2018	4:39p	Wed	1/10/2018	8:30p		3.85
Carmel High School	Thu	1/11/2018	4:40p	Thu	1/11/2018	7:30p	SAC	2.83
Carmel High School	Tue	1/16/2018	4:45p	Tue	1/16/2018	7:30p	SAC	2.75
Carmel High School	Wed	1/17/2018	4:46p	Wed	1/17/2018	8:30p		3.73
Carmel High School	Thu	1/18/2018	4:47p	Thu	1/18/2018	7:30p	SAC	2.72
Carmel High School	Mon	1/22/2018	4:51p	Mon	1/22/2018	8:30p		3.65
Carmel High School	Tue	1/23/2018	4:52p	Tue	1/23/2018	7:30p	SAC	2.63
Carmel High School	Wed	1/24/2018	4:53p	Wed	1/24/2018	8:30p		3.62
Carmel High School	Thu	1/25/2018	4:55p	Thu	1/25/2018	7:30p	SAC	2.58
Carmel High School	Mon	1/29/2018	4:59p	Mon	1/29/2018	8:15p	Swim	3.27
Carmel High School	Tue	1/30/2018	5:00p	Tue	1/30/2018	6:00p	Swim	1
Carmel High School	Wed	1/31/2018	5:01p	Wed	1/31/2018	8:15p	Swim	3.23
Carmel High School	Thu	2/1/2018	5:02p	Thu	2/1/2018	6:00p	Swim	0.97
Carmel High School	Fri	2/2/2018	5:03p	Fri	2/2/2018	6:00p	Swim	0.95
Carmel High School	Mon	2/5/2018	5:07p	Mon	2/5/2018	8:15p	Swim	3.13
Carmel High School	Tue	2/6/2018	5:08p	Tue	2/6/2018	6:00p	Swim	0.87
Carmel High School	Wed	2/7/2018	5:09p	Wed	2/7/2018	8:15p	Swim	3.1
Carmel High School	Thu	2/8/2018	5:10p	Thu	2/8/2018	6:00p	Swim	0.83
Carmel High School	Fri	2/9/2018	5:11p	Fri	2/9/2018	6:00p	Swim	0.82
Carmel High School	Mon	2/12/2018	5:14p	Mon	2/12/2018	6:00p	Swim	0.77
Carmel High School	Tue	2/13/2018	5:15p	Tue	2/13/2018	6:00p	Swim	0.75
Carmel High School	Wed	2/14/2018	5:16p	Wed	2/14/2018	6:00p	Swim	0.73
Carmel High School	Thu	2/15/2018	5:17p	Thu	2/15/2018	6:00p	Swim	0.72
Carmel High School	Fri	2/16/2018	5:18p	Fri	2/16/2018	6:00p	Swim	0.7
Carmel High School	Thu	3/8/2018	6:31p	Thu	3/8/2018	8:20p		1.82
Carmel High School	Mon	3/12/2018	6:42p	Mon	3/12/2018	8:20p	SAC	1.63
Carmel High School	Tue	3/13/2018	6:43p	Tue	3/13/2018	8:20p	SAC	1.62
Carmel High School	Wed	3/14/2018	6:44p	Wed	3/14/2018	8:20p	SAC	1.6
Carmel High School	Thu	3/15/2018	6:44p	Thu	3/15/2018	8:20p	SAC	1.6
Carmel High School	Mon	3/19/2018	6:48p	Mon	3/19/2018	8:20p	SAC	1.53
Carmel High School	Tue	3/20/2018	6:49p	Tue	3/20/2018	8:20p	SAC	1.52
Carmel High School	Wed	3/21/2018	6:50p	Wed	3/21/2018	8:20p	SAC	1.5
Carmel High School	Thu	3/22/2018	6:51p	Thu	3/22/2018	8:20p	SAC	1.48
Carmel High School	Mon	3/26/2018	6:54p	Mon	3/26/2018	8:20p	SAC	1.43
Carmel High School	Tue	3/27/2018	6:55p	Tue	3/27/2018	8:20p	SAC	1.42



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Carmel High School	Wed	3/28/2018	6:56p	Wed	3/28/2018	8:20p	SAC	1.4
Carmel High School	Thu	3/29/2018	6:57p	Thu	3/29/2018	8:20p	SAC	1.38
Carmel High School	Mon	4/2/2018	7:00p	Mon	4/2/2018	8:20p	SAC	1.33
Carmel High School	Tue	4/3/2018	7:01p	Tue	4/3/2018	8:20p	SAC	1.32
Carmel High School	Wed	4/4/2018	7:02p	Wed	4/4/2018	8:20p	SAC	1.3
Carmel High School	Thu	4/5/2018	7:03p	Thu	4/5/2018	8:20p	SAC	1.28
Carmel High School	Tue	4/10/2018	7:07p	Tue	4/10/2018	8:20p	SAC	1.22
Carmel High School	Wed	4/11/2018	7:08p	Wed	4/11/2018	8:20p	SAC	1.2
Carmel High School	Thu	4/12/2018	7:09p	Thu	4/12/2018	8:20p	SAC	1.18
Carmel High School	Mon	4/16/2018	7:13p	Mon	4/16/2018	8:20p	SAC	1.12
Carmel High School	Tue	4/17/2018	7:14p	Tue	4/17/2018	8:20p	SAC	1.1
Carmel High School	Wed	4/18/2018	7:15p	Wed	4/18/2018	8:20p	SAC	1.08
Carmel High School	Thu	4/19/2018	7:15p	Thu	4/19/2018	8:20p	SAC	1.08
Carmel High School	Mon	4/23/2018	7:19p	Mon	4/23/2018	8:20p	SAC	1.02
Carmel High School	Tue	4/24/2018	7:20p	Tue	4/24/2018	8:20p	SAC	1
Carmel High School	Wed	4/25/2018	7:21p	Wed	4/25/2018	8:20p	SAC	0.98
Carmel High School	Thu	4/26/2018	7:22p	Thu	4/26/2018	8:20p	SAC	0.97
Carmel High School	Mon	4/30/2018	7:25p	Mon	4/30/2018	8:20p	SAC	0.92
Carmel High School	Tue	5/1/2018	7:26p	Tue	5/1/2018	8:20p	SAC	0.9
Carmel High School	Wed	5/2/2018	7:27p	Wed	5/2/2018	8:20p	SAC	0.88
Carmel High School	Thu	5/3/2018	7:28p	Thu	5/3/2018	8:20p	SAC	0.87
Carmel High School	Mon	5/7/2018	7:31p	Mon	5/7/2018	8:20p	SAC	0.82
Carmel High School	Tue	5/8/2018	7:32p	Tue	5/8/2018	8:20p	SAC	0.8
Carmel High School	Wed	5/9/2018	7:33p	Wed	5/9/2018	8:20p	SAC	0.78
Carmel High School	Thu	5/10/2018	7:34p	Thu	5/10/2018	8:20p	SAC	0.77
Carmel High School	Mon	5/14/2018	7:37p	Mon	5/14/2018	8:20p	SAC	0.72
Carmel High School	Tue	5/15/2018	7:38p	Tue	5/15/2018	8:20p	SAC	0.7
Carmel High School	Wed	5/16/2018	7:39p	Wed	5/16/2018	8:20p	SAC	0.68
Carmel High School	Thu	5/17/2018	7:40p	Thu	5/17/2018	8:20p	SAC	0.67
Carmel High School	Mon	5/21/2018	7:43p	Mon	5/21/2018	8:20p	SAC	0.62
Carmel High School	Tue	5/22/2018	7:44p	Tue	5/22/2018	8:20p	SAC	0.6
Carmel High School	Wed	5/23/2018	7:45p	Wed	5/23/2018	8:20p	SAC	0.58
Carmel High School	Thu	5/24/2018	7:46p	Thu	5/24/2018	8:20p	SAC	0.57
Carmel High School	Tue	5/29/2018	7:49p	Tue	5/29/2018	8:20p	SAC	0.52
Carmel High School	Wed	5/30/2018	7:50p	Wed	5/30/2018	8:20p	SAC	0.5
Carmel High School	Thu	5/31/2018	7:51p	Thu	5/31/2018	8:20p	SAC	0.48
Carmel High School	Thu	8/2/2018	7:44p	Thu	8/2/2018	8:40p	Water Polo	0.93
Carmel High School	Mon	8/27/2018	7:14p	Mon	8/27/2018	7:50p	Water Polo	0.6
Carmel High School	Tue	8/28/2018	7:12p	Tue	8/28/2018	7:50p	Water Polo	0.63
Carmel High School	Wed	8/29/2018	7:11p	Wed	8/29/2018	7:50p	Water Polo	0.65
Carmel High School	Thu	8/30/2018	7:10p	Thu	8/30/2018	7:50p	Water Polo	0.67
Carmel High School	Fri	8/31/2018	7:08p	Fri	8/31/2018	7:50p	Water Polo	0.7
Carmel High School	Tue	9/4/2018	7:02p	Tue	9/4/2018	7:50p	Water Polo	0.8
Carmel High School	Thu	9/6/2018	6:59p	Thu	9/6/2018	7:50p	Water Polo	0.85
Carmel High School	Fri	9/7/2018	6:58p	Fri	9/7/2018	7:50p	Water Polo	0.87
Carmel High School	Mon	9/10/2018	6:53p	Mon	9/10/2018	8:15p	Water Polo	1.37
Carmel High School	Tue	9/11/2018	6:52p	Tue	9/11/2018	7:50p	Water Polo	0.97
Carmel High School	Wed	9/12/2018	6:50p	Wed	9/12/2018	7:50p	Water Polo	1
Carmel High School	Thu	9/13/2018	6:49p	Thu	9/13/2018	7:50p	Water Polo	1.02
Carmel High School	Sat	9/15/2018	5:15a	Sat	9/15/2018	6:50a	Water Polo	1.58
Carmel High School	Mon	9/17/2018	6:43p	Mon	9/17/2018	8:30p	Water Polo	1.78
Carmel High School	Tue	9/18/2018	6:41p	Tue	9/18/2018	7:50p	Water Polo	1.15
Carmel High School	Wed	9/19/2018	6:40p	Wed	9/19/2018	8:30p	Water Polo	1.83
Carmel High School	Thu	9/20/2018	6:38p	Thu	9/20/2018	7:50p	Water Polo	1.2
Carmel High School	Fri	9/21/2018	6:37p	Fri	9/21/2018	9:30p	Water Polo	2.88
Carmel High School	Mon	9/24/2018	6:32p	Mon	9/24/2018	9:00p	Water Polo	2.47
Carmel High School	Tue	9/25/2018	6:31p	Tue	9/25/2018	7:50p	Water Polo	1.32
Carmel High School	Thu	9/27/2018	6:27p	Thu	9/27/2018	7:50p	Water Polo	1.38

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Carmel High School	Fri	9/28/2018	6:26p	Fri	9/28/2018	7:50p	Water Polo	1.4
Carmel High School	Mon	10/1/2018	6:21p	Mon	10/1/2018	7:50p	Water Polo	1.48
Carmel High School	Tue	10/2/2018	6:20p	Tue	10/2/2018	8:30p	Water Polo	2.17
Carmel High School	Wed	10/3/2018	6:18p	Wed	10/3/2018	7:50p	Water Polo	1.53
Carmel High School	Thu	10/4/2018	6:17p	Thu	10/4/2018	8:30p	Water Polo	2.22
Carmel High School	Fri	10/5/2018	6:16p	Fri	10/5/2018	7:50p	Water Polo	1.57
Carmel High School	Mon	10/8/2018	6:11p	Mon	10/8/2018	7:50p	Water Polo	1.65
Carmel High School	Tue	10/9/2018	6:10p	Tue	10/9/2018	7:50p	Water Polo	1.67
Carmel High School	Wed	10/10/2018	6:08p	Wed	10/10/2018	7:50p	Water Polo	1.7
Carmel High School	Fri	10/12/2018	6:05p	Fri	10/12/2018	7:50p	Water Polo	1.75
Carmel High School	Mon	10/15/2018	6:01p	Mon	10/15/2018	7:50p	Water Polo	1.82
Carmel High School	Wed	10/17/2018	5:59p	Wed	10/17/2018	7:50p	Water Polo	1.85
Carmel High School	Fri	10/19/2018	5:56p	Fri	10/19/2018	6:30p	Water Polo	0.57
Carmel High School	Sat	10/20/2018	5:55p	Sat	10/20/2018	6:45p	Water Polo	0.83
Carmel High School	Mon	10/22/2018	5:52p	Mon	10/22/2018	7:50p	Water Polo	1.97
Carmel High School	Tue	10/23/2018	5:51p	Tue	10/23/2018	9:00p	Water Polo	3.15
Carmel High School	Tue	11/13/2018	4:50p	Tue	11/13/2018	7:15p	Seaside Aq	2.42
Carmel High School	Wed	11/14/2018	4:50p	Wed	11/14/2018	7:15p	Seaside Aq	2.42
Carmel High School	Thu	11/15/2018	4:50p	Thu	11/15/2018	7:15p	Seaside Aq	2.42
Carmel High School	Mon	11/19/2018	4:50p	Mon	11/19/2018	7:15p	Seaside Aq	2.42
Carmel High School	Tue	11/20/2018	4:50p	Tue	11/20/2018	7:15p	Seaside Aq	2.42
Carmel High School	Mon	11/26/2018	4:50p	Mon	11/26/2018	7:15p	Seaside Aq	2.42
Carmel High School	Tue	11/27/2018	4:50p	Tue	11/27/2018	7:15p	Seaside Aq	2.42
Carmel High School	Wed	11/28/2018	4:50p	Wed	11/28/2018	7:15p	Seaside Aq	2.42
Carmel High School	Thu	11/29/2018	4:50p	Thu	11/29/2018	7:15p	Seaside Aq	2.42
Carmel High School	Mon	12/3/2018	4:50p	Mon	12/3/2018	7:15p	Seaside Aq	2.42
Carmel High School	Tue	12/4/2018	4:50p	Tue	12/4/2018	7:15p	Seaside Aq	2.42
Carmel High School	Wed	12/5/2018	4:50p	Wed	12/5/2018	7:15p	Seaside Aq	2.42
Carmel High School	Thu	12/6/2018	4:50p	Thu	12/6/2018	7:15p	Seaside Aq	2.42
Carmel High School	Mon	12/10/2018	4:50p	Mon	12/10/2018	7:15p	Seaside Aq	2.42
Carmel High School	Tue	12/11/2018	4:50p	Tue	12/11/2018	7:15p	Seaside Aq	2.42
Carmel High School	Wed	12/12/2018	4:50p	Wed	12/12/2018	7:15p	Seaside Aq	2.42
Carmel High School	Thu	12/13/2018	4:50p	Thu	12/13/2018	7:15p	Seaside Aq	2.42
Carmel High School	Mon	12/17/2018	4:50p	Mon	12/17/2018	7:15p	Seaside Aq	2.42
Carmel High School	Tue	12/18/2018	4:50p	Tue	12/18/2018	7:15p	Seaside Aq	2.42
Carmel High School	Wed	12/19/2018	4:50p	Wed	12/19/2018	7:15p	Seaside Aq	2.42
Carmel High School	Thu	12/20/2018	4:50p	Thu	12/20/2018	7:15p	Seaside Aq	2.42
Carmel High School	Tue	1/8/2019	4:37p	Tue	1/8/2019	7:30p	Seaside Aq	2.88
Carmel High School	Mon	1/14/2019	4:43p	Mon	1/14/2019	7:20p	Seaside Aq	2.62
Carmel High School	Tue	1/15/2019	4:44p	Tue	1/15/2019	7:20p	Seaside Aq	2.6
Carmel High School	Tue	1/22/2019	4:51p	Tue	1/22/2019	7:20p	Seaside Aq	2.48
Carmel High School	Wed	1/23/2019	4:52p	Wed	1/23/2019	7:20p	Seaside Aq	2.47
Carmel High School	Thu	1/24/2019	4:53p	Thu	1/24/2019	7:20p	Seaside Aq	2.45
Carmel High School	Mon	1/28/2019	4:58p	Mon	1/28/2019	8:20p	Swim	3.37
Carmel High School	Tue	1/29/2019	4:59p	Tue	1/29/2019	8:20p	Swim	3.35
Carmel High School	Wed	1/30/2019	5:00p	Wed	1/30/2019	8:20p	Swim	3.33
Carmel High School	Thu	1/31/2019	5:01p	Thu	1/31/2019	8:20p	Swim	3.32
Carmel High School	Fri	2/1/2019	5:02p	Fri	2/1/2019	6:00p	Swim	0.97
Carmel High School	Mon	2/4/2019	5:05p	Mon	2/4/2019	8:20p	Swim	3.25
Carmel High School	Tue	2/5/2019	5:06p	Tue	2/5/2019	8:20p	Swim	3.23
Carmel High School	Wed	2/6/2019	5:07p	Wed	2/6/2019	8:20p	Swim	3.22
Carmel High School	Thu	2/7/2019	5:08p	Thu	2/7/2019	8:20p	Swim	3.2
Carmel High School	Fri	2/8/2019	5:09p	Fri	2/8/2019	6:00p		0.85
Carmel High School	Mon	2/11/2019	5:13p	Mon	2/11/2019	8:20p	Swim	3.12
Carmel High School	Tue	2/12/2019	5:14p	Tue	2/12/2019	8:20p	Swim	3.1
Carmel High School	Wed	2/13/2019	5:15p	Wed	2/13/2019	8:20p	Swim	3.08
Carmel High School	Thu	2/14/2019	5:16p	Thu	2/14/2019	8:20p	Swim	3.07
Carmel High School	Tue	2/19/2019	5:21p	Tue	2/19/2019	8:20p	Swim	2.98

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Carmel High School	Wed	2/20/2019	5:22p	Wed	2/20/2019	8:20p	Swim	2.97
Carmel High School	Thu	2/21/2019	5:23p	Thu	2/21/2019	8:20p	Swim	2.95
Carmel High School	Mon	2/25/2019	5:27p	Mon	2/25/2019	8:20p	Swim	2.88
Carmel High School	Tue	2/26/2019	5:28p	Tue	2/26/2019	8:20p	Swim	2.87
Carmel High School	Wed	2/27/2019	5:29p	Wed	2/27/2019	8:20p	Swim	2.85
Carmel High School	Thu	2/28/2019	5:30p	Thu	2/28/2019	8:20p	Swim	2.83
Carmel High School	Mon	3/4/2019	5:34p	Mon	3/4/2019	8:20p	Swim	2.77
Carmel High School	Tue	3/5/2019	5:35p	Tue	3/5/2019	8:20p	Swim	2.75
Carmel High School	Wed	3/6/2019	5:36p	Wed	3/6/2019	8:20p	Swim	2.73
Carmel High School	Thu	3/7/2019	5:37p	Thu	3/7/2019	8:20p	Swim	2.72
Carmel High School	Mon	3/11/2019	6:41p	Mon	3/11/2019	8:20p	Swim	1.65
Carmel High School	Tue	3/12/2019	6:41p	Tue	3/12/2019	8:20p	Swim	1.65
Carmel High School	Wed	3/13/2019	6:42p	Wed	3/13/2019	8:20p	Swim	1.63
Carmel High School	Thu	3/14/2019	6:43p	Thu	3/14/2019	8:20p	Swim	1.62
Carmel High School	Mon	3/18/2019	6:47p	Mon	3/18/2019	8:20p	Swim	1.55
Carmel High School	Tue	3/19/2019	6:48p	Tue	3/19/2019	8:20p	Swim	1.53
Carmel High School	Wed	3/20/2019	6:49p	Wed	3/20/2019	8:20p	Swim	1.52
Carmel High School	Thu	3/21/2019	6:50p	Thu	3/21/2019	8:20p	Swim	1.5
Carmel High School	Mon	3/25/2019	6:53p	Mon	3/25/2019	8:20p	Swim	1.45
Carmel High School	Tue	3/26/2019	6:54p	Tue	3/26/2019	8:20p	Swim	1.43
Carmel High School	Wed	3/27/2019	6:55p	Wed	3/27/2019	8:20p	Swim	1.42
Carmel High School	Thu	3/28/2019	6:56p	Thu	3/28/2019	8:20p	Swim	1.4
Carmel High School	Mon	4/1/2019	6:59p	Mon	4/1/2019	8:20p	Swim	1.35
Carmel High School	Tue	4/2/2019	7:00p	Tue	4/2/2019	8:20p	Swim	1.33
Carmel High School	Wed	4/3/2019	7:01p	Wed	4/3/2019	8:20p	Swim	1.32
Carmel High School	Thu	4/4/2019	7:02p	Thu	4/4/2019	8:20p	Swim	1.3
Carmel High School	Mon	4/8/2019	7:06p	Mon	4/8/2019	8:20p	Swim	1.23
Carmel High School	Tue	4/9/2019	7:06p	Tue	4/9/2019	8:20p	Swim	1.23
Carmel High School	Wed	4/10/2019	7:07p	Wed	4/10/2019	8:20p	Swim	1.22
Carmel High School	Thu	4/11/2019	7:08p	Thu	4/11/2019	8:20p	Swim	1.2
Carmel High School	Mon	4/15/2019	7:12p	Mon	4/15/2019	8:20p	Swim	1.13
Carmel High School	Tue	4/16/2019	7:13p	Tue	4/16/2019	8:20p	Swim	1.12
Carmel High School	Wed	4/17/2019	7:13p	Wed	4/17/2019	8:20p	Swim	1.12
Carmel High School	Thu	4/18/2019	7:14p	Thu	4/18/2019	8:20p	Swim	1.1
Carmel High School	Mon	4/22/2019	7:18p	Mon	4/22/2019	8:20p	Swim	1.03
Carmel High School	Tue	4/23/2019	7:19p	Tue	4/23/2019	8:20p	Swim	1.02
Carmel High School	Wed	4/24/2019	7:20p	Wed	4/24/2019	8:20p	Swim	1
Carmel High School	Thu	4/25/2019	7:21p	Thu	4/25/2019	8:20p	Swim	0.98
Carmel High School	Mon	4/29/2019	7:24p	Mon	4/29/2019	8:20p	Swim	0.93
Carmel High School	Tue	4/30/2019	7:25p	Tue	4/30/2019	8:20p	Swim	0.92
Carmel High School	Mon	8/26/2019	7:16p	Mon	8/26/2019	7:50p	Water Polo	0.57
Carmel High School	Tue	8/27/2019	7:14p	Tue	8/27/2019	7:50p	Water Polo	0.6
Carmel High School	Wed	8/28/2019	7:13p	Wed	8/28/2019	7:50p	Water Polo	0.62
Carmel High School	Thu	8/29/2019	7:11p	Thu	8/29/2019	7:50p	Water Polo	0.65
Carmel High School	Fri	8/30/2019	7:10p	Fri	8/30/2019	8:30p	Water Polo	1.33
Carmel High School	Tue	9/3/2019	7:04p	Tue	9/3/2019	7:50p	Water Polo	0.77
Carmel High School	Wed	9/4/2019	7:03p	Wed	9/4/2019	7:50p	Water Polo	0.78
Carmel High School	Thu	9/5/2019	7:01p	Thu	9/5/2019	8:00p	Water Polo	0.98
Carmel High School	Fri	9/6/2019	7:00p	Fri	9/6/2019	7:50p	Water Polo	0.83
Carmel High School	Mon	9/9/2019	6:55p	Mon	9/9/2019	7:50p	Water Polo	0.92
Carmel High School	Tue	9/10/2019	6:54p	Tue	9/10/2019	7:50p	Water Polo	0.93
Carmel High School	Wed	9/11/2019	6:52p	Wed	9/11/2019	7:50p	Water Polo	0.97
Carmel High School	Thu	9/12/2019	6:51p	Thu	9/12/2019	7:50p	Water Polo	0.98
Carmel High School	Fri	9/13/2019	6:49p	Fri	9/13/2019	7:50p	Water Polo	1.02
Carmel High School	Mon	9/16/2019	6:45p	Mon	9/16/2019	8:30p		1.75
Carmel High School	Tue	9/17/2019	6:43p	Tue	9/17/2019	7:50p	Water Polo	1.12
Carmel High School	Wed	9/18/2019	6:42p	Wed	9/18/2019	7:50p	Water Polo	1.13
Carmel High School	Thu	9/19/2019	6:40p	Thu	9/19/2019	8:30p		1.83

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Carmel High School	Mon	9/23/2019	6:34p	Mon	9/23/2019	7:50p	Water Polo	1.27
Carmel High School	Tue	9/24/2019	6:32p	Tue	9/24/2019	7:50p	Water Polo	1.3
Carmel High School	Thu	9/26/2019	6:29p	Thu	9/26/2019	7:50p	Water Polo	1.35
Carmel High School	Fri	9/27/2019	6:28p	Fri	9/27/2019	9:20p	Water Polo	2.87
Carmel High School	Mon	9/30/2019	6:23p	Mon	9/30/2019	7:50p	Water Polo	1.45
Carmel High School	Tue	10/1/2019	6:22p	Tue	10/1/2019	8:30p		2.13
Carmel High School	Wed	10/2/2019	6:20p	Wed	10/2/2019	7:50p	Water Polo	1.5
Carmel High School	Thu	10/3/2019	6:19p	Thu	10/3/2019	8:15p	Water Polo	1.93
Carmel High School	Fri	10/4/2019	6:17p	Fri	10/4/2019	8:30p		2.22
Carmel High School	Sat	10/5/2019	6:35p	Sat	10/5/2019	7:50p		1.25
Carmel High School	Mon	10/7/2019	6:13p	Mon	10/7/2019	7:50p	Water Polo	1.62
Carmel High School	Tue	10/8/2019	6:12p	Tue	10/8/2019	7:50p	Water Polo	1.63
Carmel High School	Wed	10/9/2019	6:10p	Wed	10/9/2019	8:30p		2.33
Carmel High School	Thu	10/10/2019	6:09p	Thu	10/10/2019	7:50p	Water Polo	1.68
Carmel High School	Fri	10/11/2019	6:07p	Fri	10/11/2019	7:50p	Water Polo	1.72
Carmel High School	Mon	10/14/2019	6:03p	Mon	10/14/2019	7:20p	Water Polo	1.28
Carmel High School	Mon	10/14/2019	5:45a	Mon	10/14/2019	7:14a	Water Polo	1.48
Carmel High School	Tue	10/15/2019	5:45a	Tue	10/15/2019	7:15a	Water Polo	1.5
Carmel High School	Wed	10/16/2019	6:00p	Wed	10/16/2019	8:30p	Water Polo	2.5
Carmel High School	Thu	10/17/2019	5:59p	Thu	10/17/2019	6:30p		0.52
Carmel High School	Mon	10/21/2019	5:54p	Mon	10/21/2019	6:30p		0.6
Carmel High School	Mon	10/21/2019	6:32p	Mon	10/21/2019	9:00p		2.47
Carmel High School	Tue	10/22/2019	5:52p	Tue	10/22/2019	7:50p	Water Polo	1.97
Carmel High School	Wed	10/23/2019	5:51p	Wed	10/23/2019	7:50p	Water Polo	1.98
Carmel High School	Thu	10/24/2019	5:50p	Thu	10/24/2019	8:30p		2.67
Carmel High School	Fri	10/25/2019	5:49p	Fri	10/25/2019	9:15p		3.43
Carmel High School	Mon	10/28/2019	5:45p	Mon	10/28/2019	7:50p	Water Polo	2.08
Carmel High School	Tue	10/29/2019	5:44p	Tue	10/29/2019	7:50p	Water Polo	2.1
Carmel High School	Wed	10/30/2019	5:43p	Wed	10/30/2019	6:45p		1.03
Carmel High School	Thu	10/31/2019	5:42p	Thu	10/31/2019	7:50p	Water Polo	2.13
Carmel High School	Mon	11/4/2019	4:38p	Mon	11/4/2019	6:20p	Water Polo	1.7
Carmel High School	Tue	11/5/2019	4:37p	Tue	11/5/2019	5:50p	Water Polo	1.22
Carmel High School	Wed	11/6/2019	4:36p	Wed	11/6/2019	5:50p	Water Polo	1.23
Carmel High School	Thu	11/7/2019	4:35p	Thu	11/7/2019	6:00p		1.42
Carmel High School	Fri	11/8/2019	4:34p	Fri	11/8/2019	5:50p	Water Polo	1.27
Carmel High School	Tue	11/12/2019	4:30p	Tue	11/12/2019	5:50p	Water Polo	1.33
Carmel High School	Wed	11/13/2019	5:20p	Wed	11/13/2019	6:15p		0.92
Carmel High School	Thu	11/14/2019	4:29p	Thu	11/14/2019	6:00p	SAC	1.52
Carmel High School	Mon	11/18/2019	4:26p	Mon	11/18/2019	6:00p	SAC	1.57
Carmel High School	Tue	11/19/2019	4:26p	Tue	11/19/2019	6:00p	SAC	1.57
Carmel High School	Wed	11/20/2019	4:25p	Wed	11/20/2019	6:00p	SAC	1.58
Carmel High School	Thu	11/21/2019	4:25p	Thu	11/21/2019	6:00p	SAC	1.58
Carmel High School	Mon	11/25/2019	4:23p	Mon	11/25/2019	6:00p	SAC	1.62
Carmel High School	Tue	11/26/2019	4:22p	Tue	11/26/2019	6:00p	SAC	1.63
Carmel High School	Wed	11/27/2019	4:22p	Wed	11/27/2019	6:00p	SAC	1.63
Carmel High School	Mon	12/2/2019	4:21p	Mon	12/2/2019	8:15p	SAC	3.9
Carmel High School	Tue	12/3/2019	4:21p	Tue	12/3/2019	8:15p	SAC	3.9
Carmel High School	Wed	12/4/2019	4:21p	Wed	12/4/2019	8:15p	SAC	3.9
Carmel High School	Thu	12/5/2019	4:20p	Thu	12/5/2019	8:15p	SAC	3.92
Carmel High School	Mon	12/9/2019	4:21p	Mon	12/9/2019	8:15p	SAC	3.9
Carmel High School	Tue	12/10/2019	4:21p	Tue	12/10/2019	8:15p	SAC	3.9
Carmel High School	Wed	12/11/2019	4:21p	Wed	12/11/2019	8:15p	SAC	3.9
Carmel High School	Thu	12/12/2019	4:21p	Thu	12/12/2019	8:15p	SAC	3.9
Carmel High School	Mon	12/16/2019	4:22p	Mon	12/16/2019	8:15p	SAC	3.88
Carmel High School	Tue	12/17/2019	4:22p	Tue	12/17/2019	8:15p	SAC	3.88
Carmel High School	Wed	12/18/2019	4:23p	Wed	12/18/2019	8:15p	SAC	3.87
Carmel High School	Thu	12/19/2019	4:23p	Thu	12/19/2019	8:15p	SAC	3.87
Carmel High School	Mon	1/6/2020	4:35p	Mon	1/6/2020	8:15p	Seaside Aq	3.67



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Carmel High School	Tue	1/7/2020	4:36p	Tue	1/7/2020	8:15p	Seaside Aq	3.65
Carmel High School	Wed	1/8/2020	4:37p	Wed	1/8/2020	8:15p	Seaside Aq	3.63
Carmel High School	Thu	1/9/2020	4:38p	Thu	1/9/2020	8:15p	Seaside Aq	3.62
Carmel High School	Fri	1/10/2020	5:25p	Fri	1/10/2020	6:40p		1.25
Carmel High School	Mon	1/13/2020	4:42p	Mon	1/13/2020	8:15p	Seaside Aq	3.55
Carmel High School	Tue	1/14/2020	4:43p	Tue	1/14/2020	8:15p	Seaside Aq	3.53
Carmel High School	Wed	1/15/2020	4:44p	Wed	1/15/2020	8:15p	Seaside Aq	3.52
Carmel High School	Thu	1/16/2020	4:45p	Thu	1/16/2020	8:15p	Seaside Aq	3.5
Carmel High School	Fri	1/17/2020	4:46p	Fri	1/17/2020	6:40p	Seaside Aq	1.9
Carmel High School	Tue	1/21/2020	4:50p	Tue	1/21/2020	8:15p	Seaside Aq	3.42
Carmel High School	Wed	1/22/2020	4:51p	Wed	1/22/2020	8:15p	Seaside Aq	3.4
Carmel High School	Thu	1/23/2020	4:52p	Thu	1/23/2020	8:15p	Seaside Aq	3.38
Carmel High School	Fri	1/24/2020	4:53p	Fri	1/24/2020	6:40p	Seaside Aq	1.78
Carmel High School	Mon	1/27/2020	4:56p	Mon	1/27/2020	8:15p	Seaside Aq	3.32
Carmel High School	Tue	1/28/2020	4:57p	Tue	1/28/2020	8:15p	Seaside Aq	3.3
Carmel High School	Wed	1/29/2020	4:58p	Wed	1/29/2020	8:15p	Seaside Aq	3.28
Carmel High School	Thu	1/30/2020	4:59p	Thu	1/30/2020	8:15p	Seaside Aq	3.27
Carmel High School	Fri	1/31/2020	5:01p	Fri	1/31/2020	6:40p	Seaside Aq	1.65
Carmel High School	Mon	2/3/2020	5:04p	Mon	2/3/2020	8:15p	Swim	3.18
Carmel High School	Tue	2/4/2020	5:05p	Tue	2/4/2020	8:15p	Swim	3.17
Carmel High School	Wed	2/5/2020	5:06p	Wed	2/5/2020	8:15p	Swim	3.15
Carmel High School	Thu	2/6/2020	5:07p	Thu	2/6/2020	8:15p	Swim	3.13
Carmel High School	Fri	2/7/2020	5:08p	Fri	2/7/2020	8:15p	Swim	3.12
Carmel High School	Mon	2/10/2020	5:11p	Mon	2/10/2020	8:15p	Swim	3.07
Carmel High School	Tue	2/11/2020	5:12p	Tue	2/11/2020	8:15p	Swim	3.05
Carmel High School	Wed	2/12/2020	5:14p	Wed	2/12/2020	8:15p	Swim	3.02
Carmel High School	Thu	2/13/2020	5:15p	Thu	2/13/2020	8:15p	Swim	3
Carmel High School	Fri	2/14/2020	5:16p	Fri	2/14/2020	8:15p	Swim	2.98
Carmel High School	Tue	2/18/2020	5:20p	Tue	2/18/2020	8:15p	Swim	2.92
Carmel High School	Wed	2/19/2020	5:21p	Wed	2/19/2020	8:15p	Swim	2.9
Carmel High School	Thu	2/20/2020	5:22p	Thu	2/20/2020	8:15p	Swim	2.88
Carmel High School	Fri	2/21/2020	5:23p	Fri	2/21/2020	8:15p	Swim	2.87
Carmel High School	Mon	2/24/2020	5:26p	Mon	2/24/2020	8:15p	Swim	2.82
Carmel High School	Tue	2/25/2020	5:27p	Tue	2/25/2020	8:15p	Swim	2.8
Carmel High School	Wed	2/26/2020	5:28p	Wed	2/26/2020	8:15p	Swim	2.78
Carmel High School	Thu	2/27/2020	5:29p	Thu	2/27/2020	8:15p	Swim	2.77
Carmel High School	Fri	2/28/2020	5:30p	Fri	2/28/2020	8:15p	Swim	2.75
Carmel High School	Mon	3/2/2020	5:33p	Mon	3/2/2020	8:15p	Swim	2.7
Carmel High School	Tue	3/3/2020	5:34p	Tue	3/3/2020	8:15p	Swim	2.68
Carmel High School	Wed	3/4/2020	5:35p	Wed	3/4/2020	8:15p	Swim	2.67
Carmel High School	Thu	3/5/2020	5:36p	Thu	3/5/2020	8:15p	Swim	2.65
Carmel High School	Fri	3/6/2020	5:37p	Fri	3/6/2020	8:15p	Swim	2.63
Carmel High School	Mon	3/9/2020	6:39p	Mon	3/9/2020	8:15p	Swim	1.6
Carmel High School	Tue	3/10/2020	6:40p	Tue	3/10/2020	8:15p	Swim	1.58
Carmel High School	Wed	3/11/2020	6:41p	Wed	3/11/2020	8:15p	Swim	1.57
Carmel High School	Thu	3/12/2020	6:42p	Thu	3/12/2020	8:15p	Swim	1.55
Carmel High School	Mon	3/30/2020	6:58p	Mon	3/30/2020	8:15p	Swim	1.28
Carmel High School	Tue	3/31/2020	6:59p	Tue	3/31/2020	8:15p	Swim	1.27
Carmel High School	Wed	4/1/2020	7:00p	Wed	4/1/2020	8:15p	Swim	1.25
Carmel High School	Thu	4/2/2020	7:01p	Thu	4/2/2020	8:15p	Swim	1.23
Carmel High School	Fri	4/3/2020	7:02p	Fri	4/3/2020	8:15p	Swim	1.22
Carmel High School	Mon	4/6/2020	7:04p	Mon	4/6/2020	8:15p	Swim	1.18
Carmel High School	Tue	4/7/2020	7:05p	Tue	4/7/2020	8:15p	Swim	1.17
Carmel High School	Wed	4/8/2020	7:06p	Wed	4/8/2020	8:15p	Swim	1.15
Carmel High School	Thu	4/9/2020	7:07p	Thu	4/9/2020	8:15p	Swim	1.13
Carmel High School	Fri	4/10/2020	7:08p	Fri	4/10/2020	8:15p	Swim	1.12
Carmel High School	Tue	4/14/2020	7:11p	Tue	4/14/2020	8:15p	Swim	1.07
Carmel High School	Wed	4/15/2020	7:12p	Wed	4/15/2020	8:15p	Swim	1.05

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Carmel High School	Thu	4/16/2020	7:13p	Thu	4/16/2020	8:15p	Swim	1.03
Carmel High School	Fri	4/17/2020	7:14p	Fri	4/17/2020	8:15p	Swim	1.02
Carmel High School	Mon	4/20/2020	7:17p	Mon	4/20/2020	8:15p	Swim	0.97
Carmel High School	Tue	4/21/2020	7:18p	Tue	4/21/2020	8:15p	Swim	0.95
Carmel High School	Wed	4/22/2020	7:19p	Wed	4/22/2020	8:15p	Swim	0.93
Carmel High School	Thu	4/23/2020	7:19p	Thu	4/23/2020	8:15p	Swim	0.93
Carmel High School	Fri	4/24/2020	7:20p	Fri	4/24/2020	8:15p	Swim	0.92
Carmel High School	Tue	11/3/2020	4:38p	Tue	11/3/2020	6:15p		1.62
Carmel High School	Thu	11/5/2020	4:36p	Thu	11/5/2020	6:15p		1.65
Carmel High School	Tue	11/10/2020	4:31p	Tue	11/10/2020	6:15p		1.73
Carmel High School	Thu	11/12/2020	4:30p	Thu	11/12/2020	6:15p		1.75
Carmel High School	Tue	11/17/2020	4:26p	Tue	11/17/2020	6:15p		1.82
Carmel High School	Thu	11/19/2020	4:25p	Thu	11/19/2020	6:15p		1.83
Carmel High School	Mon	2/22/2021	5:25p	Mon	2/22/2021	6:20p		0.92
Carmel High School	Tue	2/23/2021	5:26p	Tue	2/23/2021	6:20p		0.9
Carmel High School	Thu	2/25/2021	5:28p	Thu	2/25/2021	7:20p		1.87
Carmel High School	Mon	3/1/2021	5:32p	Mon	3/1/2021	6:20p		0.8
Carmel High School	Tue	3/2/2021	5:33p	Tue	3/2/2021	6:20p		0.78
Carmel High School	Thu	3/4/2021	5:34p	Thu	3/4/2021	7:20p		1.77
Carmel High School	Mon	3/8/2021	5:38p	Mon	3/8/2021	6:20p		0.7
Carmel High School	Tue	3/9/2021	5:39p	Tue	3/9/2021	6:20p		0.68
Carmel High School	Thu	3/11/2021	5:41p	Thu	3/11/2021	7:20p		1.65
Carmel High School	Fri	3/19/2021	6:48p	Fri	3/19/2021	7:45p	Water Polo	0.95
Carmel High School	Mon	3/29/2021	6:57p	Mon	3/29/2021	9:00p	Water Polo	2.05
Carmel High School	Tue	3/30/2021	6:58p	Tue	3/30/2021	9:00p	Water Polo	2.03
Carmel High School	Wed	3/31/2021	6:59p	Wed	3/31/2021	9:00p	Water Polo	2.02
Carmel High School	Thu	4/1/2021	7:00p	Thu	4/1/2021	9:00p	Water Polo	2
Carmel High School	Fri	4/2/2021	7:01p	Fri	4/2/2021	9:00p	Water Polo	1.98
Carmel High School	Mon	4/5/2021	7:03p	Mon	4/5/2021	9:00p	Water Polo	1.95
Carmel High School	Tue	4/6/2021	7:04p	Tue	4/6/2021	9:00p	Water Polo	1.93
Carmel High School	Wed	4/7/2021	7:05p	Wed	4/7/2021	9:00p	Water Polo	1.92
Carmel High School	Thu	4/8/2021	7:06p	Thu	4/8/2021	9:00p	Water Polo	1.9
Carmel High School	Fri	4/9/2021	7:07p	Fri	4/9/2021	9:00p	Water Polo	1.88
Carmel High School	Tue	4/13/2021	7:10p	Tue	4/13/2021	9:00p	Water Polo	1.83
Carmel High School	Wed	4/14/2021	7:11p	Wed	4/14/2021	9:00p	Water Polo	1.82
Carmel High School	Thu	4/15/2021	7:12p	Thu	4/15/2021	9:00p	Water Polo	1.8
Carmel High School	Fri	4/16/2021	7:13p	Fri	4/16/2021	9:00p	Water Polo	1.78
Carmel High School	Mon	4/19/2021	7:16p	Mon	4/19/2021	9:00p	Water Polo	1.73
Carmel High School	Tue	4/20/2021	7:17p	Tue	4/20/2021	9:00p	Water Polo	1.72
Carmel High School	Wed	4/21/2021	7:17p	Wed	4/21/2021	9:00p	Water Polo	1.72
Carmel High School	Thu	4/22/2021	7:18p	Thu	4/22/2021	9:00p	Water Polo	1.7
Carmel High School	Fri	4/23/2021	7:19p	Fri	4/23/2021	9:00p	Water Polo	1.68
Carmel High School	Mon	4/26/2021	7:22p	Mon	4/26/2021	9:00p	Water Polo	1.63
Carmel High School	Tue	4/27/2021	7:23p	Tue	4/27/2021	9:00p	Water Polo	1.62
Carmel High School	Wed	4/28/2021	7:24p	Wed	4/28/2021	9:00p	Water Polo	1.6
Carmel High School	Thu	4/29/2021	7:25p	Thu	4/29/2021	9:00p	Water Polo	1.58
Carmel High School	Fri	4/30/2021	7:25p	Fri	4/30/2021	9:00p	Water Polo	1.58
Carmel High School	Mon	5/3/2021	7:28p	Mon	5/3/2021	9:00p	Water Polo	1.53
Carmel High School	Tue	5/4/2021	7:29p	Tue	5/4/2021	9:00p	Water Polo	1.52
Carmel High School	Wed	5/5/2021	7:30p	Wed	5/5/2021	9:00p	Water Polo	1.5
Carmel High School	Thu	5/6/2021	7:31p	Thu	5/6/2021	9:00p	Water Polo	1.48
Carmel High School	Fri	5/7/2021	7:32p	Fri	5/7/2021	9:00p	Water Polo	1.47
Carmel High School	Mon	5/10/2021	7:34p	Mon	5/10/2021	9:00p	Water Polo	1.43
Carmel High School	Tue	5/11/2021	7:35p	Tue	5/11/2021	9:00p	Water Polo	1.42
Carmel High School	Wed	5/12/2021	7:36p	Wed	5/12/2021	9:00p	Water Polo	1.4
Carmel High School	Thu	5/13/2021	7:37p	Thu	5/13/2021	9:00p	Water Polo	1.38
Carmel High School	Fri	5/14/2021	7:38p	Fri	5/14/2021	9:00p	Water Polo	1.37
Carmel High School	Tue	5/18/2021	7:41p	Tue	5/18/2021	9:00p	Seaside Aq	1.32



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Carmel High School	Wed	5/19/2021	7:42p	Wed	5/19/2021	9:00p	Seaside Aq	1.3
Carmel High School	Thu	5/20/2021	7:43p	Thu	5/20/2021	9:00p	Seaside Aq	1.28
Carmel High School	Fri	5/21/2021	7:43p	Fri	5/21/2021	9:00p	Seaside Aq	1.28
Carmel High School	Mon	5/24/2021	7:46p	Mon	5/24/2021	9:00p	Seaside Aq	1.23
Carmel High School	Tue	5/25/2021	7:47p	Tue	5/25/2021	9:00p	Seaside Aq	1.22
Carmel High School	Wed	5/26/2021	7:47p	Wed	5/26/2021	9:00p	Seaside Aq	1.22
Carmel High School	Thu	5/27/2021	7:48p	Thu	5/27/2021	9:00p	Seaside Aq	1.2
Carmel High School	Fri	5/28/2021	7:49p	Fri	5/28/2021	9:00p	Seaside Aq	1.18
Carmel High School	Mon	8/23/2021	7:19p	Mon	8/23/2021	8:00p	Water Polo	0.68
Carmel High School	Tue	8/24/2021	7:18p	Tue	8/24/2021	8:00p	Water Polo	0.7
Carmel High School	Wed	8/25/2021	7:16p	Wed	8/25/2021	8:00p	Water Polo	0.73
Carmel High School	Thu	8/26/2021	7:15p	Thu	8/26/2021	8:00p	Water Polo	0.75
Carmel High School	Fri	8/27/2021	7:13p	Fri	8/27/2021	8:00p	Water Polo	0.78
Carmel High School	Mon	8/30/2021	7:09p	Mon	8/30/2021	8:00p	Water Polo	0.85
Carmel High School	Tue	8/31/2021	7:08p	Tue	8/31/2021	8:00p	Water Polo	0.87
Carmel High School	Wed	9/1/2021	7:06p	Wed	9/1/2021	8:00p	Water Polo	0.9
Carmel High School	Thu	9/2/2021	7:05p	Thu	9/2/2021	8:00p	Water Polo	0.92
Carmel High School	Fri	9/3/2021	7:03p	Fri	9/3/2021	8:00p	Water Polo	0.95
Carmel High School	Tue	9/7/2021	6:57p	Tue	9/7/2021	8:00p	Water Polo	1.05
Carmel High School	Wed	9/8/2021	6:56p	Wed	9/8/2021	8:00p	Water Polo	1.07
Carmel High School	Thu	9/9/2021	6:54p	Thu	9/9/2021	8:00p	Water Polo	1.1
Carmel High School	Fri	9/10/2021	6:53p	Fri	9/10/2021	8:00p	Water Polo	1.12
Carmel High School	Mon	9/13/2021	6:48p	Mon	9/13/2021	8:00p	Water Polo	1.2
Carmel High School	Tue	9/14/2021	6:47p	Tue	9/14/2021	8:00p	Water Polo	1.22
Carmel High School	Wed	9/15/2021	6:45p	Wed	9/15/2021	8:00p	Water Polo	1.25
Carmel High School	Thu	9/16/2021	6:44p	Thu	9/16/2021	8:00p	Water Polo	1.27
Carmel High School	Fri	9/17/2021	6:42p	Fri	9/17/2021	8:00p	Water Polo	1.3
Carmel High School	Mon	9/20/2021	6:38p	Mon	9/20/2021	8:00p	Water Polo	1.37
Carmel High School	Tue	9/21/2021	6:36p	Tue	9/21/2021	8:30p	Water Polo	1.9
Carmel High School	Wed	9/22/2021	6:35p	Wed	9/22/2021	8:00p	Water Polo	1.42
Carmel High School	Fri	9/24/2021	6:32p	Fri	9/24/2021	8:00p	Water Polo	1.47
Carmel High School	Mon	9/27/2021	6:27p	Mon	9/27/2021	8:00p	Water Polo	1.55
Carmel High School	Tue	9/28/2021	6:26p	Tue	9/28/2021	8:30p	Water Polo	2.07
Carmel High School	Wed	9/29/2021	6:24p	Wed	9/29/2021	8:00p	Water Polo	1.6
Carmel High School	Thu	9/30/2021	6:23p	Thu	9/30/2021	8:30p	Water Polo	2.12
Carmel High School	Fri	10/1/2021	6:21p	Fri	10/1/2021	8:00p	Water Polo	1.65
Carmel High School	Mon	10/4/2021	6:17p	Mon	10/4/2021	8:00p	Water Polo	1.72
Carmel High School	Tue	10/5/2021	6:15p	Tue	10/5/2021	8:30p	Water Polo	2.25
Carmel High School	Wed	10/6/2021	6:14p	Wed	10/6/2021	8:00p	Water Polo	1.77
Carmel High School	Thu	10/7/2021	6:12p	Thu	10/7/2021	8:00p	Water Polo	1.8
Carmel High School	Fri	10/8/2021	6:11p	Fri	10/8/2021	8:00p	Water Polo	1.82
Carmel High School	Mon	10/18/2021	5:57p	Mon	10/18/2021	8:30p	Water Polo	2.55
Carmel High School	Tue	10/19/2021	5:56p	Tue	10/19/2021	8:00p	Water Polo	2.07
Carmel High School	Thu	10/21/2021	5:53p	Thu	10/21/2021	8:00p	Water Polo	2.12
Carmel High School	Tue	10/26/2021	5:47p	Tue	10/26/2021	8:00p	Water Polo	2.22
Carmel High School	Wed	10/27/2021	5:46p	Wed	10/27/2021	8:00p	Water Polo	2.23
Carmel High School	Thu	10/28/2021	5:45p	Thu	10/28/2021	8:00p	Water Polo	2.25
Carmel High School	Thu	11/18/2021	5:15p	Thu	11/18/2021	7:45p		2.5
Carmel High School	Tue	12/7/2021	5:45p	Tue	12/7/2021	7:00p		1.25

## Response to Letter 14-3-u, Bud Get

1. Past projects are not the subject of the RDEIR. This final EIR addresses comments on the RDEIR and does not apply to previous categorical exemptions or other projects. Please see response to Letter 10-c, comment 3. Regarding the school district adopting a policy to limit the use of the pool and stadium after dark, see response to Letter 14-2-f. Regarding approving the pool lighting retrofit without approving the stadium lights, see response to Letter 2-b, comment 1.
2. The commenter includes three attachments, which do not include comments on the RDEIR and therefore, no response is necessary.

From: **Bud Get** <budget4jh@gmail.com>

Date: Wed, Oct 5, 2022 at 7:40 PM

Subject: RDEIR: Comments regarding Special Status Species with the Potential to Occur in the Project Vicinity

To: CUSD Feedback <feedback@carmelunified.org>

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On page 203, you provide the above map. However, you don't drill down to show the exact details in words or visuals to the actual project site.

- Can you provide a drilled down view to the impact area?
- Can you provide a source link data that provides specs, facts, etc - not just visuals?
- It appears that CRLF does have high probability at CHS? Can you speak to that?

Can you comment on the research below? We live in a highly sensitive area. Can you provide more expertise and context on the risk that one person who works for the agency that you are paying?

<https://www.audubon.org/news/we-finally-know-how-bright-lights-affect-birds-flying-night>

[https://www.researchgate.net/publication/286443735\\_Dark\\_Matters\\_The\\_Effects\\_of\\_Artificial\\_Lighting\\_on\\_Bats](https://www.researchgate.net/publication/286443735_Dark_Matters_The_Effects_of_Artificial_Lighting_on_Bats)

[https://link.springer.com/chapter/10.1007/978-3-319-25220-9\\_7](https://link.springer.com/chapter/10.1007/978-3-319-25220-9_7)

## Response to Letter 14-3-v, Bud Get

1. This comment is regarding the California Department of Fish and Wildlife's Natural Diversity Database (CNDDB), which is a database of the special-status species with the potential to occur in the vicinity. Wildlife biologists and botanists use this database to assist in determining what plant and animal species to look for when conducting a survey of a project site. The results of the biologist's surveys of the actual project site and adjacent area to the east are included in Section 7.0, Biological Resources, when documents that the project site and area immediately to the east do not contain habitat for CRLF (California red-legged frog.)

The research in the link provided by the commenter is not regarding the RDEIR or environmental impacts of the proposed project and therefore, no response is necessary.

Date: Wed, Oct 5, 2022 at 7:34 PM

Subject: RDEIR Feedback: Visual Impact Assessment (VIA) and Scenic Resource Evaluation (SRE) for Scenic Highway 1

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[christopher.bjornstad@dot.ca.gov](mailto:christopher.bjornstad@dot.ca.gov)>, <[info-d5@dot.ca.gov](mailto:info-d5@dot.ca.gov)>

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**PROBLEM:**

- Carmel High School's proximity to Scenic Highway 1 is adjacent.
- Scenic Highway 1 is protected by the Corridor Program and your proposed project is Significant and Unavoidable Environmental Impact even after Mitigation Measures regarding aesthetics.
- You have not fully informed decision makers in detail (specs, facts or visual) of how significant the environmental impact would be.
- Both the Stadium Lights and the proposed new parking lot with 12 foot high poles (replacing Tennis Courts) will be highly visible from Scenic Highway one.
- Photo shows large gap of no trees on Highway 1 with stadium field and tennis courts.
- Intersection of Highway 1 and Morse shows the tennis courts highly visible.

Copying Caltrans so they have the photos that relate directly to the issues discussed.

**Mitigation Measure**

- We request Visual Impact Assessment (VIA) and Scenic Resource Evaluation (SRE). These studies are used to predict the degree and type of impact proposed transportation projects will have on the "visual" environment.
- Please show the largest impact points of the stadium lights in the daytime/nighttime from the highest level of impact (you are showing lowest level). There is a stretch on Scenic Highway 1 with no trees and you've identified as high light spill on the property.
- In addition, your new proposed parking lot (replacing tennis courts) would be highly visible at night. Please show what passengers would see from Highway 1.
- Conducting SREs and VIAs on projects requires early coordination with the Project Development Team (PDT) and representatives from the affected community.
- Please coordinate Community participation through public meetings and surveys as useful tools in predicting viewer response to proposed changes in the visual environment.
- Since budget and time constraints often limit the use of these methods, it is important to determine community values and goals by other means such as examining city general plans and meeting with local planning staff.
- Close coordination with the PDT member who is working on community impacts and the environmental planner/generalist is critical and efficient.
- This coordination should have been underway at the project initiation phase in the event that potential project impacts would require the PDT to consider design alternatives or mitigation measures that would affect project funding levels.
- It is also important to discuss these issues with other agencies, such as the California Coastal Commission, that will have an interest and stake in the outcome.
- Early coordination between the Department, the community, and other agency stakeholders facilitates timely and efficient project development.
- Visual impacts are mentioned in the National Environmental Policy Act (NEPA) of 1969 and Council on Environmental Quality (CEQ) regulations to implement NEPA under the heading of aesthetics. These regulations identify aesthetics as one of the elements or factors in the human environment that must be considered in determining the effects of a project. Further, Title 23, USC 109(h) cites "aesthetic values" as a matter that must be fully considered in developing a project. The California Environmental Quality Act (CEQA) also mentions aesthetics. Aesthetics, as used in this context relate to the visual impacts of a project.



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cont.





## Response to Letter 14-3-w, Bud Get

1. This comment is about the visual impacts from State Route 1 and the commenter includes text/discussion from Caltrans guidance for *Visual Impact Assessment (VIA) for Projects on State Highway System* (<https://dot.ca.gov/programs/design/lap-visual-impact-assessment>). Although the project can be seen from the State highway Caltrans guidance for visual impact assessments is not required.

The RDEIR evaluates the proposed project's visual impacts from State Route 1, as well as from several other locations. It should be noted that no light spill will occur beyond the school's boundary and therefore, will not spill on State Route 1. The lights will be visible from State Route 1. See Section 5.0, Aesthetics, for the visual impact analysis. See also response to Letter 2c, comment 19 regarding the difference between foot candles and candelas.

With respect to community outreach and public notice, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. Likewise, with respect to notice provided to public agencies, please see response to Letter 14-3-m, comment 1.

Regarding compliance with the County General Plan, please see response to Letter 2b, comment 4, and response to Letter 11b, comment 16.

With respect the application of NEPA to the proposed project, please refer to response to Letter 14-2-p, comment 3. Aesthetics are addressed under CEQA in Section 5.0, Aesthetics, of the RDEIR.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 7:43 PM  
Subject: RDEIR: Recap of Organization and Persons Consulted  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Letter #14-3-x

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Can we have access to the discussions, recommendations and inputs from the organizations and persons consulted? We' like to see any records of emails or written responses since they are listed as key contributors?

### **Organizations and Persons Consulted**

Anderson, Golden, Athletic Director, Carmel High School, 28 April 2021, 5 August 2022; 10 August 2022.

Bates, Wendy, Athletic Director, Monterey Peninsula College, 11 November 2021.  
Cartier, Robert, Ph.D., Principal Investigator, Archaeological Resource Management, 14 April 2021.

Costello, Ali, Musco Sports Lighting, 5 January 2022.

Crookham, Bob, Musco Sports Lighting, 6 July 2021; 5 May 2022; 18 August 2022.

Del Rio, Robert, T.E., Vice President and Principal Associate, Hexagon Transportation Consultants, 1 July 2021.

Descanzo, Luis, Engineer, Hexagon Transportation Consultants, 28 July 2022.

Gaona, Lauralea, Pacific Grove Unified School District, 26 October 2021.

Lee, Katie, P.E., Whiston Engineers, 14 July 2022; 22 July 2022; 15 August 2022.

Jacobsen, Madilyn, Transportation Planner, Transportation Agency for Monterey County, 7 June 2021.

Paul, Dan, Director of Facilities & Transportation, Carmel Unified School District, 11 May 2021; 9 June 2021; 25 June 2021; 20 May 2022; 15 June 2022; 13 July 2022;

26 July 2022; 28 July 2022; 29 July 2022; 1 August 2022; 2 August 2022; 3 August 2022;

4 August 2022; 5 August 2022; 8 August 2022; 9 August 2022; 10 August 2022;

11 August 2022; 12 August 2022; 13 August 2022; 22 August 2022.

Scates, Kenneth, AIA, LEED AP, HGHB Architecture, 5 May 2021; 15 June 2022; 22 July 2022; 15 August 2022.

Spencer, Craig, Planning Manager, Monterey County Housing and Community Development, 21 June 2021; 29 July 2022.

Swanson, Brandon, Community Planning & Building Director, City of Carmel-by-the-Sea, 7 June 2021; 29 July 2022.

Van Groningen, Walter J., President, WJV Acoustics, Inc., 6 July 2021; 29 July 2022.

Zack, Timothy R., Principal/Senior Design Visualization Specialist, 3DScape, 13 May 2021; 25 April 2022; 12 August 2022.

## Response to Letter 14-3-x, Bud Get

1. The commenter is requesting access to the “discussions, recommendations, and inputs from the organizations and persons consulted.” These organizations and persons are identified in Section 19.0 of the RDEIR. Under CEQA, an EIR must list the organizations and persons who were consulted in preparing a draft EIR. (CEQA Guidelines, §15129.) This is a list of consultations that occurred and the dates of those consultations rather than a list of documents relied upon or referenced. This comment does not raise an environmental issue and therefore, no response is necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 7:44 PM  
Subject: RDEIR: Page 11 on Appendix J  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 | ***On Page 11 you state:: Based on the existing capacity of existing parking lots, a majority of traffic would park within the Ocean Avenue parking lot.***

Circulation within the parking lot consists of a looping southbound-only drive aisle and northbound-only drive aisle which run between the two site access points located at the north and south ends of the lot.

A cut-through aisle between the north-south drive aisles is located approximately half-way between the two access points. Circulation is continuous and the existing one way operation of the drive aisles minimizes conflicts between inbound and outbound vehicles.

***However, inbound queues into the parking lot could form during the peak-hour of arrivals.*** To facilitate access to the parking lot and to prevent excessive queueing onto SR 1, it is recommended that traffic control officers be deployed at both driveways on Ocean Avenue. Parking lot monitors should monitor the availability of parking spaces and should coordinate with officers to close inbound access when the parking lot is full. The southerly driveway of the Ocean Avenue parking lot is an ingress-only driveway. However, some vehicles may attempt to exit via the southerly driveway, creating delays and potentially inhibiting circulation within the parking lot. During Friday evening football games, it is recommended that temporary signage be installed at the southerly driveway to prohibit vehicles from exiting. The placement of traffic control devices such as traffic cones along SR 1 may not be feasible due to no median being present between the northbound and southbound lanes.

**COMMENTS/QUESTIONS:**

- You underestimate the inbound queues as you can't seem to control this during weekday conditions. Why don't you do this during regular school days as evidence you can control? See picture of what is happening now on a consistent basis.
- Can you provide traffic flow on the actual main campus? Lots of discussion of what is happening outside of the main parking lot but you don't show the parking lot and signage itself.
- What is the emergency access route on campus that intersections with the main parking lot?
- Where and how would emergency vehicles be able to pass with all the vehicles being in the cue?

## Response to Letter 14-3-y, Bud Get

1. This comment is regarding the Vehicle Miles Traveled (VMT) assessment and intersection operations, site access and parking evaluation for the proposed project located in Appendix J of the RDEIR. The commenter questions why the district doesn't control existing conditions, but does not comment on the proposed project or the project analysis. However, please refer to Section 11.0, Transportation and Parking, for an analysis of the proposed project, which includes 111 additional on-site parking spaces. Also note Mitigation Measure 11-4 regarding a Traffic Management Plan for highly-attended games. Emergency access routes are depicted in Figure 4-1, Overall Site Plan, and Figure 4-6, Post Development Overall Parking Exhibit, in Section 4.0, Project Description, of the RDEIR. See also response to Letter 14-2-f.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 7:47 PM  
Subject: RDEIR: Noise Impacts  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

Why doesn't the RDEIR include reference noise levels for the following known or foreseeable noise sources:

- foot-stomping on aluminum bleachers
- music played over the PA system
- bands
- air horns

Consequently, none of these are represented in the RDEIR noise analysis, resulting in an inadequate assessment that underestimates the foreseeable impacts.

Marching Band:

Does CHS have a marching band? What is the benchmark sound level? Why wouldn't that increase with excitement with more attendees?

Air Horns: Local residents report hearing the sound of air horns at past games. Therefore, they should be included in the noise analysis.

Handheld air horns that may be purchased for less than \$15 are capable of producing a noise level of 125 dB at 3¼ feet (95 dB at 100 feet). The SeaSense horn states "Ideal for all sporting events" on its label, and one listed feature is, "Can be heard up to one mile away".<sup>9</sup>

Foot-Stomping: The floorboards of aluminum bleachers may and often are used as a drum. This is one cheering advantage that the visiting spectators will have, and, being mostly highschool students, they may be expected to take full advantage of it. Just as one kettle drum player contributes significant sound energy to an orchestra, only a relatively small number of fans need to stomp in unison to excite the entire aluminum bleacher structure, greatly amplifying their efforts.



## Response to Letter 14-3-z, Bud Get

1. Regarding noise levels, see response to Letter 2b, comment 3, which includes a discussion of a supplemental noise study conducted at the Carmel High School football game played on October 1, 2022, the conclusions of which, confirm that the analysis in the RDEIR was conservative, overestimating the projected noise impacts of the proposed project.

Carmel High School does not have a marching band, but does have live pep band music during football games.

Air horns were not identified in the noise assessment conducted on October 1, 2022. The predominant noise-producing activities and actions observed by the acoustical consultant during the football game were cheering crowds, pep band activities, and referee whistles.

No changes to the RDEIR are necessary.

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From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 7:43 PM  
Subject: RDEIR Feedback: Public Comments from First DEIR Must Stand (Part II)  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 We agree that the school district has SUBSTANTIALLY revised the former draft EIR that we want the process to start again with a proper Scoping Session and Notice of Preparation. The new scope is significant and UNRELATED to stadium lights. Please remove below or RESTART the entire Project.

- New 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.

2 In addition, you have hidden this fact ON PAGE 22 AND HAVE NOT INFORMED ANYONE FROM THE PUBLIC:

*The school district has substantially revised the former draft EIR, and this RDEIR replaces the previous draft EIR in its entirety. Therefore, the comments received on the original draft EIR will not receive a response or be addressed in the final EIR. Only the public comments received during the 45-day public review period for the RDEIR will be responded to and be addressed in the final EIR.*

*Our original public comments and concerns still stand with the RDEIR. Please address the attached comments.*

## Response to Letter 14-4-a, Bud Get

1. Regarding the NOP, a second NOP is not required when a lead agency revises and recirculates a draft EIR in response to public comments. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.
2. The commenter has submitted several comment letters on the former draft EIR. The RDEIR (page 1-8, PDF page 22) states, “In accordance with CEQA Guidelines section 15088.5(f)(1), it is the intent of the school district to address the issues raised in the comment letters received during the public review period for the original draft EIR, in this RDEIR. The school district has substantially revised the former draft EIR, and this RDEIR replaces the previous draft EIR in its entirety. Therefore, the comments received on the original draft EIR will not receive a response or be addressed in the final EIR. Only the public comments received during the 45-day public review period for the RDEIR will be responded to and be addressed in the final EIR.” This same information is also set forth in the Notice of Completion and Availability, dated August 25, 2022, and in previous public updates issued by the district.

Responses to letters commenting on the former draft EIR, which were attached to this comment email, do not require responses. Please refer to response to Letter 14-1-u, comment 1, for further discussion.

----- Forwarded message -----

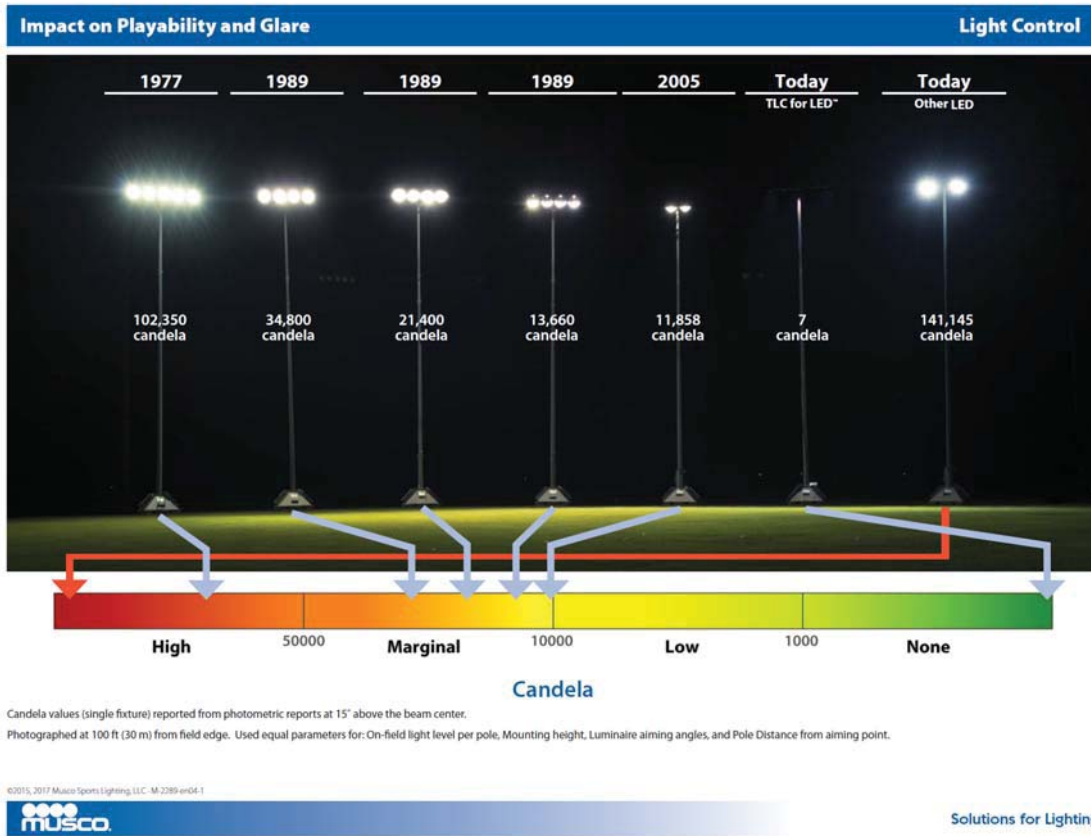
From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 7:48 PM

Subject: RDEIR: Appendix C Light Data

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1



Clearly you are making it impossible for the average resident to understand the light implications unless we are lighting experts.

Given the impact is "Significant and Unavoidable" we are assuming the worst.

Why not be clear and specific to what we can expect?

You have this image in the Appendix. Why are we not getting 7 candela? We see number up to 187 for protected scenic highway 1 (closer to 2005 line than today) Are we getting professional lights versus appropriate lights for highschool football?

2

Where does the cumulative light impact sit within stadium lights AND pool lights are on?



## Response to Letter 14-4-b, Bud Get

1. The illumination and candelas analysis for the pool facility lighting retrofit and the new stadium lighting are included in Appendix C, and analysis in Section 5.0, Aesthetics, of the RDEIR. Each of the photo simulations include the light from the pool facility, the stadium, and the new southern parking lot. See also response to Letter 2c, comment 19.

The design and configuration of the proposed lights are consistent with the recommendation from the Illuminating Engineers Society for safe and adequate field lighting for high school use.

2. Regarding the cumulative light spill, see Appendix C, PDF page 40. For the cumulative candela, see Appendix C, PDF page 41. See also response to Letter 2C, comment 19.



----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 7:53 PM

Subject: RDEIR Feedback: Request Visual Impact of Parking Lots and Scenic Highway 1

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[christopher.bjornstad@dot.ca.gov](mailto:christopher.bjornstad@dot.ca.gov)>, <[info-d5@dot.ca.gov](mailto:info-d5@dot.ca.gov)>

1

You provide no details to any of the proposed parking lots.

Given the Tennis Courts are visible from Scenic Highway 1 What exactly will we see?

Can you provide visual expression of what we'll see?

This photo is for the record so we have baseline showing of Scenic Highway 1, Morse and Potential parking lot.

Will you be removing parking spaces as there are current parking spaces now but we don't see them in the roll-up?

We see a painted "red curb" - is that regulated? Is that a firelane? What would happen to this area with proposed Tennis courts being ripped out?

Providing this photo as Project Site reference.



## Response to Letter 14-4-c, Bud Get

1. Regarding the proposed parking lots, plans are included in the RDEIR in Section 4.0, Project Description in Figure 4-8 and Figure 4-10. The demolition plans for these locations are included in Figure 4-7 and Figure 4-9. There is sufficient information in these plans to evaluate the environmental impacts associated with them. Please also see response to Letter 14-3-e.

The proposed project would not remove any existing parking spaces.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 7:55 PM  
Subject: RDEIR: LOCAL INCREASE OF VIOLENCE at Night Time FootBall Games  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

**Can you speak to the potential of more criminal, violent or mis-behavior that nighttime games might attract? Below is a very recent article that might demonstrate this point. What is your plan for increased security? What do you have now and what do you propose?**

Teen shot while leaving North Monterey County High football game

According to the sheriff's office, two juveniles made threats to another teen at the North Monterey County High School. The two people making threats were ejected from the property by high school employees. Afterward, the same two people shot at the teen they had confronted at the game as he was leaving in his car. The victim refused medical treatment and later reported one round grazed his arm. 9/28/22, 11:54 AM Teen shot while leaving high school football game in Monterey County <https://www.ksbw.com/article/teen-shot-while-leaving-north-monterey-county-high-football-game/41395462> 4/5 GOOD HOUSEKEEP

<https://www.ksbw.com/article/violence-breaks-out-at-2-central-coast-high-school-football-games/41397785>

*SALINAS, Calif. —*

*Friday Night Lights on the Central Coast turned violent following two football games in Monterey and San Benito counties in which fights and gunfire erupted.*

*In Monterey County four people were shot following the Condor game at North Monterey County High School.*

*Sheriff's deputies said two juveniles showed up at the game and challenged another male before they were kicked out.*

*Investigators said the two juveniles then followed the victim as he drove home with three friends and then fired several shots at their car. No one was seriously injured but no arrests have been made in the shooting.*

*Around the same time that incident was happening, deputies in San Benito County were arresting four people at the Hollister game following a couple of fights and a knife being brandished.*

*“That's sad, that's really, really sad,” said Rae Jameson of Hollister.*

*That incident started when a fight broke out near the snack bar. That's where one teen was injured when he was cut by a knife but deputies are not sure if he accidentally cut himself. While deputies are investigating that fight three juveniles challenged them to a fight and they were immediately arrested. After that, a fight broke out outside the gates. And then following that a deputy is threatened with his life.*

*“An adult male walked up to the commander and said I know who you are and I'll kill you and your family and so he was taken into custody for those threats,” said San Benito county sheriff Eric Taylor.*

*“It is getting out of hand. It's way too much, it's just not here it's everywhere now and something's gotta be done,” added Jameson.*

*Sheriff Taylor said that type of behavior won't be tolerated so he's working with school leaders to beef up security that could include a clear bag policy, metal detectors and probation officers to help at the gates.*

*“To make sure that we have a proactive approach outside the gates that we can see if there's any trouble brewing before it even comes into the game so that we can stop it at the gate and not let it into the facility,” said Taylor.*

*At least some Hollister high school students think game security could be increased.*

*“Like bag checks or like the scanner thing the body scanners. I think that would make it more safe to know if people have stuff on them,” said Hollister sophomore Alexis Garrett.*

*“Yea maybe just more security, pat downs making sure that no none does nothing with anything in there probable help,” said Garrett's classmate Dylan Huerta.*

*High school and district leaders said they were saddened by Friday's violence but assure the school community they are working with law enforcement for the best tactics moving forward.*

*They confirmed some of those involved in the criminal activity are students and will be dealt with according to district policy.*

## Response to Letter 14-4-d, Bud Get

1. The comment is about violence at other high schools and does not raise an environmental issue. Past incidents of violence at other high schools are outside the scope of the RDEIR and the CEQA process. Allegations that proposed nighttime games would result in “more criminal, violent, or mis-behavior” raises social issues rather than environmental issues that must be reviewed under CEQA. (See CEQA Guidelines, §15131(a); see also *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 585.) Therefore, no response is necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 7:57 PM

Subject: RDEIR: Comments on VMT and Intersection of Tennis vs. Soccer at CHS

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

You not Employing VMT as the metric of transportation properly in assessing which students qualify to go or stay at CMS or CHS.

In order to promote Green House Gas (GHG) emission reductions consistent with SB 375, you are incorrectly influencing on-the-ground development and assessing transportation with an inaccurate approach.

Also, VMT measures the full distance of **personal motorized vehicle-trips** with one end within the project.

**REQUEST: Please approach VMT in the accurate Vehicles Miles Travelled AND #Trips!**

**PAGE 107:**

- Boys' and girls' soccer & JV teams (80 athletes + 50): Math shows 1,490 travelling off-campus

- Boys' and girls' tennis teams (24 athletes): Math shows 1,032 travelling off-campus

However, tennis students travel farther, THUS FIXING the Tennis Courts should be more sustainable.

- From CHS to Mission Ranch is 2 Miles

- From CHS to Carmel Valley Athletic Club is 3.8 Miles

- 2 days per week 13 weeks per year x 24 Students

**Questions:**

- Breakdown the travel mode more for Van, Bus, or Student/Parent Drivers

- Special District Bus for Soccer – so less individual trips as calculated but more sustainable

- You indicate Student Drivers for Soccer? What is the breakdown?

- For soccer you indicate: Van, Bus, or Student/Parent, Drivers. Does this mean no school organized approach?

- If school is providing dedicated busses to soccer team, why are you using "Per Person" metric vs. "Bus" travel?

- How many kids in school provided buses for soccer? IS this for practice or the game?

- If the goal is to **generate shorter and fewer vehicle trips and students are using personal vehicles vs. school buses**, can we have where the tennis students are travelling from? School doesn't organize a bus for them? Why not?

- Why tear down tennis courts?

A more sustainable community strategy is to focus on building the right size of fields at CMS for the largest group already there (80+ soccer students). Bringing soccer teams back to CHS further adds to the Significant and Unavoidable Impact.



## Response to Letter 14-4-e, Bud Get

1. This comment is about Vehicle Miles Traveled (VMT) associated with existing teams practicing off-site versus proposed teams practicing off-site. As presented in Section 3.0, Existing Setting, and Section 4.0, Project Description, the number of students going off-site to practice after implementation of the project would be reduced and therefore, result in a reduction of VMT.

Regarding “tennis students travel farther,” the commenter errs in stating that the tennis teams travel to Mission Ranch and Carmel Valley Athletic Club (CVAC) will result in additional VMT. As presented in Section 3.0, Environmental Setting (page 3-17), and Section 4.0, Project Description (pages 4-21, 4-33, 4-36, and 4-37), of the RDEIR, the tennis teams currently travel to Mission Ranch and CVAC for home matches and tournaments and will continue to do so with implementation of the project. Therefore, VMT associated with tennis teams matches and tournaments would not change with implementation of the proposed project.

With respect to VMT for soccer, please refer to response to Letter 14-3-a.

Regarding building the right sized fields at Carmel Middle School, see Alternative 4 in Section 18.0, Alternatives, in the RDEIR.

No changes to the RDEIR are necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 7:54 PM

Subject: RDEIR Feedback: Traffic Circulation into Residential Street North Carmel Hills (Project Site Photo)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

Your stated objective is to improve traffic circulation but your solution is more parking spaces?

That doesn't describe or solve the root problem of traffic flow.

Please be honest you are currently spilling into the existing neighborhood

Please provide historical context of all complaints from the neighbors.

This photo shows North Carmel Hills, a residential street flowing into CHS. It's often used as the entrance and is consistently backed up.

You are so worried about increasing parking spaces but you don't admit you have NO MORE ROOM to grow at CHS - you just keep trying to cram more on to that tiny campus!

Stop the nonsense - move growth to CMS as an alternative.



## Response to Letter 14-4-f, Bud Get

1. This comment is regarding school-related parking in the adjacent neighborhoods, and the addition of parking on campus. Adding parking on-campus would reduce parking in the neighborhoods and improve on-campus circulation, as drivers searching for open parking spaces would be reduced. Please refer to section 11.0, Transportation and Parking, of the RDEIR for further analysis.

The comment is repetitive of general comments previously stated by the commenter. Please refer to responses to Letters 14-1-c, 14-1-k, 14-1-m, and 14-2-z.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 8:01 PM  
Subject: RDEIR: Details on 20-Foot DRIVEWAY!  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[christopher.bjornstad@dot.ca.gov](mailto:christopher.bjornstad@dot.ca.gov)>, <[info-d5@dot.ca.gov](mailto:info-d5@dot.ca.gov)>

1

**page 91:** *The second access will be a **20-foot driveway** providing access to Morse Drive and the existing access to the baseball field parking to the east. The new parking lot will be lighted and will feature cut-off luminaires on **12-foot-high poles with three-foot concrete bases**. Supplemental/replacement low level (four-foot +/-) pedestrian pathway lights would also be installed.*

**PAGE 72: 4.2 PROJECT CHARACTERISTICS**

Summary: The school district is proposing the following improvements at Carmel High School:

- Stadium field lights;
- New 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
- Replacing light fixtures at the swimming pool

**QUESTIONS:**

- You are unclear on where the 20-foot driveway will be? In the write-ups, it sounds like it's down that access lane to the baseball field? What are the whitelines? Is that the potential encroachment permit you need up against the neighbors yards? You've already screwed them once with installing the batting cages and not doing a CEQA process. That noise still drives everyone nuts! Be more transparent and specific. **This IS NEW - MUST RESTART with SCOPING SESSION - NOT PART OF THE NOP OR COMMUNITY ENGAGEMENT. SO MISLEADING!!!!**
- Where is your disclosure and details on the 12 foot-high poles with 3 foot concrete bases? No mock-ups, no details, no KOPs, What can we see from Scenic Highway?
- This is concept only - how are we to provide meaningful feedback?
- Where is the Emergency Access Route?
- We see the walk-way up from the baseball field - is that safe? It looks right on the fire lane? do we want to encourage pedestrians on this roadway? Why not just fix the back stairs that are broken?
- Are the white lines grading measurements? What are the measurements?
- We see a Caltrans Right of Way - this is new Scope. Have they seen and provided feedback?



1  
cont.



## Response to Letter 14-4-g, Bud Get

1. Regarding the 20-foot driveway, this driveway would provide access to existing Morse Drive and to the existing access road to the baseball parking area, as presented on pages 2-1 (Summary), pages 4-2, 4-21, Figure 4-1, Overall Site Plan (Project Description); page 11-12 (Transportation and Parking). The 20-foot driveway is located at the southwest corner of the proposed parking lot replacing the tennis courts, connecting the parking lot with Morse Drive. As presented in the RDEIR, and illustrated on Figure 4-1, a four-foot sidewalk is proposed along the internal road connecting Morse Drive to the existing baseball field parking. Please also see response to Letter 14-3-e.

Regarding the white lines in Figure 4-10, Tennis Court Parking Lot – Conceptual Design, they represent the elevations around the proposed parking lot.

Regarding the parking lot lights, the visual simulations included both the light poles and the light associated with the light poles. The parking lot and light poles, as well as the stadium light poles are most visible as simulated in Figure 5-5b, KOP-2 – Morse Drive (Daytime Proposed); Figure 5-13b, KOP-2 – Morse Drive (Nighttime Proposed). The design data used in the visual simulations is attached to this response. No changes to the RDEIR are necessary.

Past projects, baseball field facilities, and other purported issues identified in the comment are not the subject of the RDEIR.

For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.

With respect to notice provided to CalTrans, please see response to Letter 14-2-j.



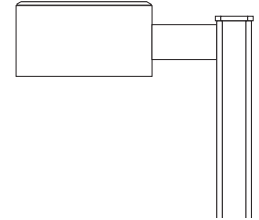


Job:  
Type:  
Notes:



# Form 10 Square LED

The Philips Gardco arm mounted Square Form 10 LED products are cutoff luminaires featuring LED arrays. Square Form 10 LED luminaires provide performance excellence and advanced Philips Gardco LED thermal management technology. High performance Class 1 LED systems offer the potential for energy savings up to 50 % when compared to HID systems. The EH units are manufactured from mitered extruded aluminum and finished in an Architectural Class 1 anodizing. The H style luminaires are die formed aluminum with a thermoset polyester finish. Form 10 Square LED luminaires provide full cutoff performance and feature a flat glass lens.



PREFIX	MOUNTING	DISTRIBUTION	LED WATTAGE	LED SELECTION	VOLTAGE	FINISH	OPTIONS
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Enter the order code into the appropriate box above. Note: Philips Gardco reserves the right to refuse a configuration. Not all combinations and configurations are valid. Refer to notes below for exclusions and limitations. For questions or concerns, please consult the factory.

## PREFIX

Available in 70LA and 85LA LED Wattages Only

<b>EH14L</b>	14" Square Extruded Luminaire LED - Constant Wattage
<b>EH14L-DIM</b>	14" Square Extruded Luminaire LED - 0-10V Dimming
<b>H14L</b>	14" Square Fabricated Luminaire LED - Constant Wattage
<b>H14L-DIM</b>	14" Square Fabricated Luminaire LED - 0-10V Dimming

Available in 110LA and 160LA LED Wattages Only

<b>EH19L</b>	19" Square Extruded Luminaire LED - Constant Wattage
<b>EH19L-DIM</b>	19" Square Extruded Luminaire LED - 0-10V Dimming
<b>H19L</b>	19" Square Fabricated Luminaire LED - Constant Wattage
<b>H19L-DIM</b>	19" Square Fabricated Luminaire LED - 0-10V Dimming

Retrofit Kits for existing Form 10 Square 14" and 19" HID luminaires are available. See Legacy LED Retrofit Kits Submittal Data Sheet (G200-21) for Retrofit Kit information.

## MOUNTING

<b>1</b>	Single Pole Mount
<b>2</b>	Twin Pole Mount at 180°
<b>2@90</b>	Twin Pole Mount at 90°
<b>3</b>	3-way Pole Mount at 90°
<b>3@120°</b>	3-way Pole Mount at 120°
<b>4</b>	4-way Pole Mount

## DISTRIBUTION

<b>2</b>	Type II
<b>3</b>	Type III
<b>4</b>	Type IV
<b>5</b>	Type V

Type II, Type III and Type IV optics are field rotatable. Type V optics feature unitized lens.

## LED WATTAGE AND LUMEN VALUES

Ordering Code	Average System Watts <sup>1</sup>	LED Current (mA)	LED Selection	Luminaire Initial Absolute Lumens <sup>2,3</sup>				<b>Basis of Lumen Data:</b> Photometric tests performed in compliance with IESNA LM-79, except where otherwise indicated. <b>Notes:</b> 1. Wattage may vary by +/- 8% due to LED manufacturer forward volt specification and ambient temperature. Wattage shown is average for 120V through 277V input. Actual wattage may vary by an additional +/- 10% due to actual input voltage. 2. Values shown are for luminaires without the HS external shield option. Tests are in process for luminaires with the HS option and WW luminaires. Contact Gardco.applications@philips.com if approximate estimates are required for design purposes. 3. LED arrays feature LEDs that provide from 100 to 130 lumens per watt when operated at 350 mA. Lumen values based on tests performed in compliance with IESNA LM-79. (s) Marked values are scaled from NW tests on the same luminaire.
				TYPE 2	TYPE 3	TYPE 4	TYPE 5	
<b>70LA</b>	70	350	CW	6,517	6,735	6,568	6,438	
			NW	5,938	6,124	5,989	5,874	
<b>85LA</b>	85	350	CW	7,860	8,114	8,342	8,245	
			NW	7,468	7,697	7,491	7,323	
<b>110LA</b>	110	350	CW	9,535(s)	9,908(s)	9,641(s)	9,526(s)	
			NW	8,911	9,260	9,010	8,903	
<b>160LA</b>	160	530	CW	13,170(s)	13,698(s)	13,244(s)	13,180(s)	
			NW	12,308	12,802	12,378	12,311	

## LED SELECTION

<b>CW</b>	Cool White - 5700°K - 75 CRI
<b>NW</b>	Neutral White - 4000°K - 70 CRI
<b>WW</b>	Warm White - 3000°K - 80 CRI

## VOLTAGE

<b>UNIV</b>	120V through 277V, 50hz or 60hz
<b>HVU</b>	347V through 480V, 50hz or 60hz (High Voltage Universal)

1611 Clovis Barker Road, San Marcos, TX 78666  
(800) 227-0758 (512) 753-1000 FAX: (512) 753-7855 [sitelighting.com](http://sitelighting.com)

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G200-022/1012

**PHILIPS**





# Form 10 Square LED

## FINISH

### EH Style

- BRA** Bronze Anodized
- BLA** Black Anodized
- NA** Natural Anodized
- OC** Optional Color Paint  
*Specify Optional Color or RAL ex: OC-LGP or OC-RAL7024.*
- SC** Special Paint  
*Specify. Must supply color chip.*

### H Style

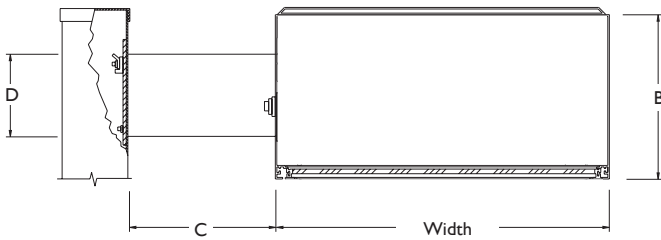
- BRP** Bronze Paint
- BLP** Black Paint
- OC** Optional Color Paint  
*Specify Optional Color or RAL ex: OC-LGP or OC-RAL7024.*
- SC** Special Paint  
*Specify. Must supply color chip.*

## OPTIONS

- F<sup>4</sup>** Fusing In Head
- LF** In-Line/In-Pole Fusing
- PC<sup>4</sup>** Photocontrol and Receptacle
- PCR** Photocontrol Receptacle only
- MF** Mast Arm Fitter *Requires 2 3/8" OD mast arm.*
- MU** 10° Uptilt Bracket
- AP<sup>5</sup>** Adjustable Knuckle - Square Pole Mount
- PTF2** Pole Top Fitter - 2 3/8" - 3" Dia. Tenon
- PTF3** Pole Top Fitter - 3" - 3 1/2" Dia. Tenon
- PTF4** Pole Top Fitter - 3 1/2" - 4" Dia. Tenon
- SPR<sup>6</sup>** Surge Protection for 120V through 277V Input meeting ANSI C62.41.2
- SPRH<sup>6</sup>** Surge Protection for 347V through 480V Input meeting ANSI C62.41.2

4. Not available in 480V. Provide specific input voltage.  
 5. Only available with 1 way and 2 @ 180° mounting. Square pole mount only.  
 6. Not available with Fusing (F) option.

## DIMENSIONS AND EPA



Size	Width	B	C	D
EH14	14" 35.56 cm	7" 17.78 cm	6" 15.24 cm	5" 12.70 cm
H14	14" 35.56 cm	7" 17.78 cm	6" 5.08 cm	5" 12.70 cm
EH19	19" 48.26 cm	10" 25.40 cm	9" 22.86 cm	5" 12.70 cm
H19	19" 48.26 cm	10" 25.40 cm	9" 5.08 cm	5" 12.70 cm

Size	Effective Projected Area (EPA)			Approximate Weight
	Single	Twin	3/4	Single
14"	1.1 ft <sup>2</sup> .10 m <sup>2</sup>	2.3 ft <sup>2</sup> .21 m <sup>2</sup>	2.9 ft <sup>2</sup> .27 m <sup>2</sup>	30 lbs 13.61 kg
	2.1 ft <sup>2</sup> .20 m <sup>2</sup>	4.0 ft <sup>2</sup> .37 m <sup>2</sup>	5.5 ft <sup>2</sup> .51 m <sup>2</sup>	55 lbs 24.95 kg

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 (800) 227-0758 (512) 753-1000 FAX: (512) 753-7855 [sitelighting.com](http://sitelighting.com)

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G200-022/1012

**PHILIPS**





# Form 10 Square LED

## LUMINAIRE CONFIGURATION INFORMATION

**CONSTANT WATTAGE CONFIGURATIONS:** Standard LED luminaires provide constant wattage and constant light output when power to the luminaire is energized.

**DIMMING "-DIM" CONFIGURATIONS:** Dimmable LED luminaires are provided with 0 - 10V dimming for connection to a control system provided by others.

## SPECIFICATIONS

**GENERAL:** The Philips Gardco arm mounted Square Form 10 LED products are cutoff luminaires featuring LED arrays. Square Form 10 LED luminaires provide performance excellence and advanced Philips Gardco LED thermal management technology. High performance Class 1 LED systems offer the potential for energy savings up to 50 % when compared to HID systems. The EH units are manufactured from mitered extruded aluminum and finished in an Architectural Class 1 anodizing. The H style luminaires are die formed aluminum with a thermoset polyester finish. Form 10 Square LED luminaires provide full cutoff performance and feature a flat glass lens.

**HOUSING:** Extruded housings (EH style) are composed of precisely mitered anodized aluminum extrusions. Fabricated (H style) units are one piece, multi-formed aluminum with an integral reinforcing spline and a single concealed joint. Pressure injected silicone provides a continuous weather tight seal at all miters and points of material transition.

**ARM:** Extruded aluminum arm is wired and secured to luminaire by contractor. Assembly is suitable for mounting to pole without requiring access to luminaire.

**LENS:** Mitered, extruded anodized aluminum door frame retains the optically clear, heat and impact resistant tempered flat glass in a sealed manner using hollow section, high compliance, memory retentive extruded silicone rubber. Concealed stainless steel latch and hinge permit easy toolless access to the luminaire.

**THERMAL MANAGEMENT:** The Philips Gardco Form 10 Square LED luminaires utilize extruded aluminum integral thermal radiation fins to provide the excellent thermal management so critical to long LED system life.

**OPTICAL SYSTEMS:** Philips Gardco Form 10 Square LED luminaires utilize lensed LED arrays set to achieve IES Type II, Type III, Type IV and Type V distributions. Individual LED arrays are replaceable. Optical systems are field rotatable. Luminaires feature high performance Class 1 LED systems.

**ELECTRICAL:** Luminaires include a complete prewired LED driver assembly, provided as part of the optical assembly. Luminaires include an LED driver that accepts 120V through 277V, or 347V through 480V, 50hz to 60hz, input. Driver output is based on the LED wattage selected. Component-to-component wiring within the luminaire will carry no more than 80% of rated current and is listed by UL for use at 600 VAC at 302°F / 150°C or higher. Plug disconnects are listed by UL for use at 600 VAC, 15A or higher. Power factor is not less than 90%. Luminaires consume 0.0 watts in the off state.

**FINISH:** Extruded housings (EH style) are standard with natural, bronze, or black Aluminum Association Architectural Class I anodized finish. Special color polyester finishes are available. Formed housings (H style) are standard with a chromatic acid pretreatment. The finish coat is a thermosetting polyester baked at 450°F / 232°C to achieve an H-2H hardness measure. 2

**LABELS:** All luminaires bear UL or CUL (where applicable) Wet Location labels.

**WARRANTY:** Philips Gardco Form 10 Square LED luminaires feature a 5 year limited warranty, including a 5 year limited warranty covering LED arrays and LED drivers. See Warranty Information on [www.sitelighting.com](http://www.sitelighting.com) for complete details and exclusions.

### LED RELIABILITY:

PREDICTED LUMEN DEPRECIATION DATA		
Ambient Temperature °C	Driver mA	L <sub>70</sub> Hours <sup>7</sup>
25 °C	350 mA	150,000
	530 mA	100,000
40 °C	350 mA	100,000
	530 mA	70,000

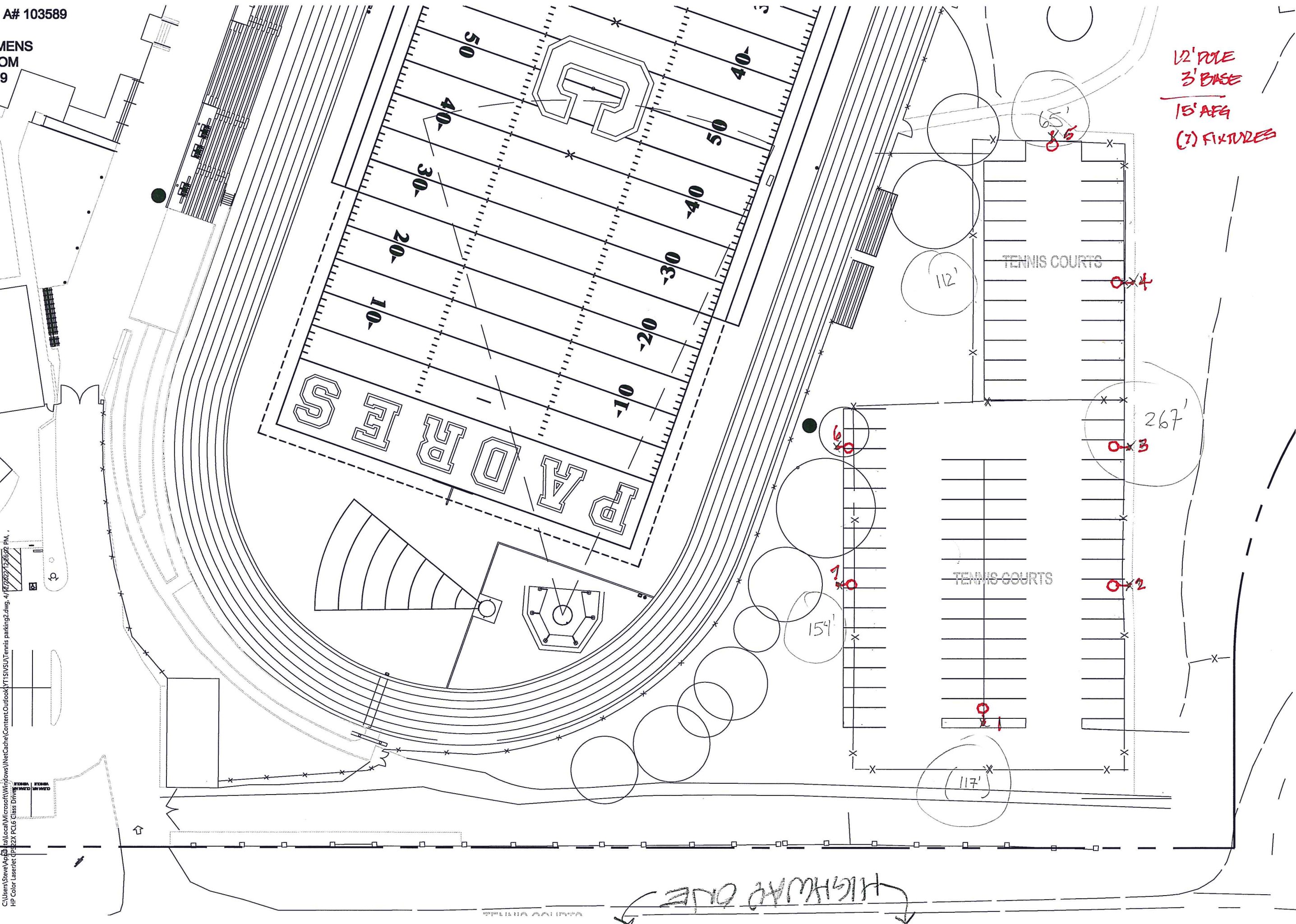
7. Predicted performance derived from LED manufacturer's data and engineering design estimates, based on IESNA LM-80 methodology. Actual experience may vary due to field application conditions. L<sub>70</sub> is the predicted time when LED performance depreciates to 70% of initial lumen output.

**FULL CUTOFF PERFORMANCE:** Full cutoff performance means a luminaire distribution where zero candela intensity occurs at an angle at or above 90° above nadir. Additionally, the candela per 1000 lamp lumens does not numerically exceed 100 (10 percent) at a vertical angle of 80° above nadir. This applies to all lateral angles around the luminaire.

**CUTOFF PERFORMANCE:** Cutoff performance means a luminaire distribution where the candela per 1000 lamp lumens does not numerically exceed 25 (2.5 percent) at an angle at or above 90° above nadir, and 100 (10 percent) at a vertical angle of 80° above nadir. This applies to all lateral angles around the luminaire.



C:\Users\Steve\AppData\Local\Microsoft\Windows\NetCache\Content\Outlook\YTTISVSVUTennis parking2.dwg, 4/17/2022 12:56:22 PM,  
HP Color LaserJet (PCL6) Class Driver



1/2" POLE  
 3" BASE  
 15' AREA  
 (7) FIXTURES

→ HIGHWAY DRIVE →



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:03 PM

Subject: RDEIR Feedback: Athletic Improvements to Include Baseball Field and Baseball Students (Close Up Photo of Entrance to Baseball Field)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 | This RDEIR has significantly increased its scope of work from the draft EIR. This in itself should immediately halt the project and trigger a restart back to Scoping Session and Notice of Preparation. We'd like to understand if this is legal what you are doing? You've added entire new projects and NOT addressing the comments from the DEIR.

2 | Given you changed the title to "stadium improvements" and have included the pool, we'd like to have the baseball fields and students part of this discussion. For too long, CUSD has not done proper planning of long-term growth at the high school campus. This RDEIR is another example of a bunch of initiatives stuck together with no vision or planning through the thoughtful process of the Facilities Master Plan.

**Request:**

- Transparency and inclusion of the baseball team in the athletic stadium assessment: Schedules, number of students
- Inclusion and option of using the baseball field as an alternative to parking lots versus the Tennis courts (transparency of what is wrong with current tennis courts and cost to fix).
- Inclusion of baseball students in the VMT/Energy/GHG analysis and comparative to the other groups; football, tennis, softball, soccer
- Options and evaluation to fix, update and connect the baseball field to the back-side of the stadium
- Why can't the stairs be fixed as usable stairs to the stadium at the upper level? Why can't the baseball fields be parking lot vs. tennis courts?

- 3 | **Can you confirm this entrance is approved by Emergency Access?**  
**What is the width of this from one point to another?**  
**Can you show us where the proposed pedestrian walk-way will look like from here? Feels dangerous?**  
**Aren't you conducting a boundary survey in the area of this site photo?**  
**What is the vegetation?**





## Response to Letter 14-4-h, Bud Get

1. The comment is repetitive of general comments previously stated by the commenter. Regarding the NOP, a second NOP is not required when a lead agency revises and recirculates a draft EIR in response to public comments. Regarding the scoping session, see response to Letter 2c, comment 3. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.
2. Regarding the baseball field, the proposed project does not include changes at the baseball field or facilities. Please see response to Letter 14-1-g, comment 4. Regarding using the baseball field as permanent parking instead of the tennis courts, see response to Letter 14-2-o, comment 2.
3. This comment is about the driveway from Morse Drive leading to the existing baseball field parking lot, and raises an environmental question about vegetation. As presented in Figure 4-10, some dirt may be removed, but no trees would need to be removed, to construct the four-foot walkway. Regarding emergency access, refer to Figure 4-1, Overall Site Plan, and Figure 4-6, Post Development Overall Parking Exhibit, of the RDEIR. See also response to Letter 14-2-f.

1

Impact 5-2. 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

Since you freely admit that even with all Mitigation Measurements, this environmental impact remains Significant and Unavoidable, the mitigation measures are silly. Alternatives:

Alternative: NO STADIUM LIGHTS

**Alternative: What do stadium lights look like at CHS (Real analysis - not the superficial one in the RDEIR)**

- What would Appendix C: Lighting Data like at the property of Carmel Middle School? Would light spill, sky glow and other metrics be different because of elevations?
- Specifically, what would page 10 of the property spill look like at one of the outlined fields at CMS? This chart shows significant impact on Scenic Highway 1 (UNACCEptABLE).
- Isn't the property at CMS less impacted on parking, VMT, Light Pollution (because of lower elevation), Noise pollution?
- Why isn't more time and effort being spent to compare CHS and CMS as viable solutions - compare apples to apples (you've done NO effort) to ensure the right environmental decision is being made for the next generation (shame on you).

EQUIPMENT LIST FOR AREAS SHOWN										
QTY	LOCATION	TYPE	SIZE	ELEVATION	MOUNTING HEIGHT	LUMINAIRE		QTY	FWS	OTHER
						TYPE	QTY			
2	F3-F2	70'	10'	15.5'	70'	TLC-BT-575	2	2	0	0
						TLC-RG-W	1	1	0	0
						TLC-EP-1500	8	8	0	0
2	F3-F4	80'	10'	15.5'	80'	TLC-BT-575	2	2	0	0
						TLC-RG-W	1	1	0	0
						TLC-EP-1500	8	8	0	0
4	TOTALS						44	44	0	0



SCALE IN FEET 1" = 200'

ENGINEERED DESIGN By: H.Sabers - File #162576D - 16-Jun-21

File location(s) + dim to 0,0 reference point(s)

## Response to Letter 14-4-i, Bud Get

1. This comment is regarding what the stadium lights would look like at Carmel High School and at the Carmel Middle School. Visual simulations were prepared for the stadium lights proposed at the high school. They are presented in Section 5.0, Aesthetics of the RDEIR. Visual simulations were not prepared for the alternative of building a lighted stadium at Carmel Middle School; however, sufficient information was provided in Section 18.0, Alternatives to conclude that the lighting impact at the middle school would also be significant and unavoidable. Section 18.0 also evaluated all of the environmental impacts associated with the middle school alternative, and compared them with the proposed project. No changes to the RDEIR are necessary.

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From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 8:04 PM  
Subject: RDEIR: Reference Resources from Page 197  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

Page 197 Reference: *Information in this section is derived from various sources including below.* We'd like access to the following:

- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CDFW 2021); NEED THE DETAILS
- California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants (CNPS 2021): NEED THE DETAILS
- U.S. Fish and Wildlife Service (USFWS) Endangered Species Program (USFWS 2021a) and National Wetlands Inventory (USFWS 2021b). NEED THE DETAILS

## Response to Letter 14-4-j, Bud Get

1. Relevant information regarding these biological resources was addressed in Section 7.0, Biological Resources, of the RDEIR. Additional information regarding these resources can be obtained as follows:

Information regarding California Department of Fish and Wildlife Natural Diversity Database can be accessed at <https://wildlife.ca.gov/Data/CNDDDB>.

Information regarding California Native Plant Society Inventory of Rare and Endangered Plants can be accessed at <https://www.cnps.org/rare-plants/cnps-inventory-of-rare-plants>.

Information regarding the U.S. Fish and Wildlife Service Endangered Species Program can be accessed at <https://www.fws.gov>.

Information regarding the National Wetlands Inventory can be accessed at <https://www.fws.gov>.

---

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 8:04 PM  
Subject: RDEIR Comments: Significant Concerns on Emergency Access Routes  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

**PROBLEM: As a baseline condition the RDEIR does not answer the question of the current state of Emergency Access Routes.**

**Questions:**

- Does CUSD have Emergency Access Routes identified? Can we see maps, diagrams and any approvals?
- Please establish the baseline and then show us specifically how the various options and alternative may impact the emergency vehicle access:
  - What does the plan look like without the new parking?
  - What does the plan look like with the entire proposed plan?
  - What is the existing safety issues with the gate at the top of the baseball field?

2

As part of the baseline, please show if the 810 DSA form was submitted for the below projects? Why or why not?  
Please include the actual plans that were submitted to DSA as separate appendixes for the public to review.

LINK: <https://www.apps2.dgs.ca.gov/dsa/tracker/ApplicationSummary.aspx?OriginId=01&AppId=119855>  
Project Application #107553, approved on 3/24/2006, contract cost: \$2,499,759.00  
Project Scope: Construction of Swimming Pool & Pool Mechanical Building  
LINK: <https://www.apps2.dgs.ca.gov/dsa/tracker/ApplicationSummary.aspx?OriginId=01&AppId=107553>  
Project Application #: 110242, approved on 6/4/2009  
Project Scope: Construction of 1-Theater Building, contract cost: \$7,955,000.00  
LINK: <https://www.apps2.dgs.ca.gov/dsa/tracker/ApplicationSummary.aspx?OriginId=01&AppId=110242>  
Project Application #: 113674, approved on 2015, contract cost: \$2,600,104.23  
Project Scope: Construction of 1-Sport Field, 1-Bleacher  
LINK: <https://www.apps2.dgs.ca.gov/dsa/tracker/ApplicationSummary.aspx?OriginId=01&AppId=113674>  
Project Application #: 114575, contract cost \$1,981,643.66  
Project Scope: Carmel Hs (carmel Usd) Bleachers  
Project Name: Construction of 1-Bleacher and Press Box  
Link: <https://www.apps2.dgs.ca.gov/dsa/tracker/ApplicationSummary.aspx?OriginId=01&AppId=114575>  
Project Application #: 114688,  
Project Scope: Alterations to 1-Fire Lane  
LINK: <https://www.apps2.dgs.ca.gov/dsa/tracker/ApplicationSummary.aspx?OriginId=01&AppId=114688>



## Response to Letter 14-4-k, Bud Get

1. Emergency access is addressed in Section 11.0, Transportation and Parking. Changes to the baseball field and facilities are not within the scope of the proposed project. Emergency access throughout the campus is provided by existing and proposed access routes. There are no special access routes in case of an emergency. See also Figure 4-1, Overall Site Plan, and Figure 4-6, Post Development Overall Parking Exhibit, as well as response to Letter 14-2-f.
2. This comment requests DSA submitted plans for past projects. Past projects are not the subject of the RDEIR. This comment is not about the proposed project or the analysis in the RDEIR; therefore, no response is necessary. This Final EIR addresses comments on the RDEIR and does not apply to other projects. Therefore, no response is necessary.

---

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 8:05 PM  
Subject: RDEIR Feedback: GMP Map  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 | **PAGE 60 in the DEIR You admit:**

*Daytime views along both northbound and southbound lanes of State Route 1 do include some unencumbered views of the stadium site and beyond. In particular, views from southbound lanes near the intersection of State Route 1 and Ocean Avenue (the main entrance to the Carmel High School campus), include views that look towards the stadium and the hillsides and mountains beyond that make up the northernmost portion of the Santa Lucia Range and provide the backdrop for the greater Carmel Valley. These hillsides are also designated as “highly sensitive” according to the “Scenic Highway Corridors & Visual Sensitivity - Greater Monterey Peninsula Map” (Monterey County 2010b)*

- Where are the KOP photos from north/south lanes that include unembcomberoed views of the stadium site and beyond?

## Response to Letter 14-4-I, Bud Get

1. This comment is regarding the visual analysis in the RDEIR, which can be found in Section 5.0, Aesthetics, of the RDEIR. See response to Letter 2b, comment 2.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:08 PM

Subject: RDEIR Feedback: Appendix J: VMT Assessment and Intersection Operations and More

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 | Hexagon's VMT Assessment has critical errors in its assessment - thus the entire section of the Transportation and Parking Section of the RDEIR is flawed and inaccurate. It should be re-done with new and accurate data:

-Why don't you provides a basis for the "math" on the number of attendees during the games? Do you have any history of ticket sales, accurate baselines, etc.?

- Prior to Covid, what is a 3-5 year trend/history of the number of games played at MPC or Pacific Grove for night games?

2 | - Are your numbers of attendees are under inflated and then over inflated whenever you want to make a point to support the stadium lights?

- You provide several conflicting numbers of increased attendance 800 or 1500? The original DREIR said 2,000. What changed and how are you calculating?

- IF the number is 800-1500, why not continue the games at MPC?

3 | - Table 1 (labeled Page 4): Proposed Schedule of Stadium Uses indicates 74 - 100 Total Evening Games Per Year, yet you state and outline only 44 in the Summary of Mitigation. What is accurate and why are the numbers conflicting?

4 | - This appendix references a critical report and yet a CPRA request indicates you do not have that report available for viewing or sharing?

5 | - Figure 1 shows Site location but unclear why this view? Please show the geographical span of where student are drawn for attendance - the is a Vehicles Miles Assessment - why don't you use the re-districting maps to show where students actually live and travel from?

6 | - RDEIR (PAGES 100 - 1003) If there will be 74 - 100 more games per year generated for use of stadium lights and up to 400 Practices more - why are those the foundation of VMT increases?

- The increase of daily trips go beyond the minimum Friday nights that you isolated it down to (inputs incorrect)

7 | - You utilize Mitty High School in San Jose as basis? Where did that come from? Who is this school and how does it compare to CHS in any way? Geographically, size of campus, size of students, parking, athletes, do they measure attendees?

- Not accurate input, you've deliberately limited the scope? Why not include all? Below is wrong (Page 8)

*The stadium lighting also would increase the attendance for other sporting events, such as soccer in*

*winter and lacrosse in the spring, from the current approximately 200*

7  
con't.

*attendees to up to 500 attendees.  
The total vehicular trips and resulting VMT of non-football events would be lower than those of evening football games since the total attendance for non-football sports events will be less than Friday night football games. Moreover, fall sports (football), winter sports (soccer), and spring sports (lacrosse/track & field) would not occur concurrently. Therefore, the evaluation of Friday evening football games represents a worst-case scenario in terms of total trips and VMT throughout the year.*

8

- If TAMC hasn't adopted SB 743 guidelines, you site OPR but it's unclear how CUSD does or does meet the threshold criteria - you just list, so can you be specific? You are pointing to office and residential and retail.

- You indicate 37 trips for Friday night football and 62 trips for home coming rivals? Where did those numbers come from? Where are the number for all the other sports?

9

- Why are the observed existing traffic conditions not done during a day game of football? Why wasn't one schedule for the first Shoe Game?

- You state that ongoing COVID effected normal traffic and yet the report you site as your new base is not available to the public: Keith Higgins, December 29th 2017). In addition, that report is LOS vs VMT - how do those numbers translate apples to apples? Bad data input = bad data output.

10

- You state the (page 9 your report) that parking demand for current Saturday games is 154 vehicles you identify that the demand at height would be 617.

PAGE 33: Under the "worst-case" scenario (i.e., rivalry or homecoming games) identified in Section 11.0, Transportation, which would occur once or twice per year, the existing on-campus parking shortfall at the  
Parking Shortfall at CHS is approximately 341 (617 demand - 276 available) parking spaces.  
Parking shortfall at CMS is approximately 218 (617 demand - 199 available - 200 overflow parking spaces).

11

- Figure 2: Recommended Temporary Traffic Control Measures shows limited and inaccurate environment impact area. This should include ocean ave and the street off-shots of Hatton shafter. It would also include CMS where the shuttles are happening and all the implications to the route going to the site from the parking.

4  
con't.

# Submit a California Public Records Act Request to Carmel USD

The Carmel Unified School District (CUSD) is committed to transparency and providing easy access to public records pursuant to the California Public Records Act (CPRA). The California Public Records Act gives the public the right to access records created and maintained by public agencies in the course of their normal business.

Pursuant to Government Code Section 6252(e), a public record is defined as “any writing containing information relating to the conduct of the public’s business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics.” Public records requests may be used to obtain “records,” which include a wide variety of documents and other materials (including print, photographic, and electronic formats) that were created or obtained by the organization and are, at the time the request is filed, in the organization’s possession and control.

Records subject to disclosure under the CPRA may include email or other communications from members of the public or which reference them. While the District reviews all responsive records to determine if this information should be disclosed, in many cases references to members of the public, or the content of their communications to the District are subject to disclosure. Permissible exemptions from disclosure include documents that invade an individual’s right to privacy (e.g., privacy in certain personnel, medical, or student records) or hinder the government’s need to perform its assigned functions in a reasonably efficient manner (e.g., maintaining confidentiality of investigative records, official information, records related to pending litigation, and preliminary notes or memoranda).

All requests will be posted to the District’s CPRA webpage.

Name of requestor: \*

First and last name

VMT Info

Email of requestor: (Responses will be provided to this email address) \*

[Redacted]



4  
con't.

Mailing address of requestor:

---

Your request: (To enable staff to respond to your request as efficiently as possible, please include: The date range for the records requested; the department that holds the records (if known); and the types of records, including any important keywords. Please do not include any confidential information.) \*

Appendix J, in the RDEIR Carmel High School Stadium Lighting VMT Assessment:

References that existing operations at the SR 1/Ocean Avenue intersection were obtained from a traffic analysis for a previously proposed development near the project site.

"The Rio Ranch Marketplace Traffic Impact Analysis (Keith Higgins, December 29, 2017) indicates that SR 1/Ocean Avenue operates at a Level of Service (LOS) C during the standard PM peak-hour based on counts collected on May 25, 2017."

We d like to have access to that report.

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This form was created inside of Carmel Unified School District.



## Response to Letter 14-4-m, Bud Get

1. This comment letter is regarding the Vehicle Miles Traveled (VMT) assessment and intersection operations, site access and parking evaluation in Appendix J of the RDEIR. This report was utilized in preparation of Section 11.0, Transportation and Parking. The projected increases in attendance when games are played in the evening are based upon past attendance numbers at the events, and the high school staff's professional experience. The number of historical home games played at Monterey Peninsula College or Pacific Grove High School is not relevant to the analysis in the RDEIR.
2. The increase in attendance could be somewhat inflated, but it was necessary to estimate on the high side in order to ensure the environmental analysis is adequate. Underestimating the numbers could result in an insufficient analysis of the impacts.

The numbers provided are not conflicting. Page 5 of the report states that attendance at home football games is expected to increase from about 500 to about 800. During a homecoming or rivalry game, attendance is expected to increase from the current 1,500 attendees to an anticipated 2,000 attendees. Factors such as team record, opponent and conflicting events are expected to affect attendance. Attendance at all other sports games (soccer, lacrosse, and field hockey) is expected to be lower than that of football games.

3. Regarding Table 1, Proposed Schedule of Stadium Uses (After Installation of Field Lights), this table is the same as Table 4-2 in the RDEIR. Regarding the use of the term “evening” in this table, and a corresponding correction in the RDEIR, see response to Letter 2b, comment 2.
4. This comment talks about an unnamed “report.” CPRA requests and responses are not the subject of the RDEIR. No response is necessary.
5. Figure 1 presented the location of the high school campus on an aerial photograph. Where students live within the district is not relevant to the VMT analysis in the RDEIR. The additional spectators attending the games because they are played at night will come from within the district boundaries, as well as from the location of the visiting team.
6. This comment states that 74-100 more games, and up to 400 more practices would be played at the high school with installation of the lights. This is incorrect information. The number of practices (350-420 practices per year) and games (74-124 games per year) *currently* played at the high school stadium are presented in Table 3-1, Existing Schedule of Stadium Uses (2022-2023). The number of practices (350 to 400 practices per year) and games (74-124 games per year) *proposed* to be played are presented in Table 4-2, Proposed Schedule of Stadium Uses (After Installation of Field Lights). The practice numbers are similar and the game numbers are identical.

7. Regarding the methodology to determine the number of persons per vehicle, see Section 11.0, Transportation and Parking, as well as response to Letter 2c, comment 14.
8. The VMT assessment methodology and results in detailed in the VMT analysis (Appendix J) on page 5, and starting on page 11-8 of the RDEIR. As stated in the VMT analysis (page 6), in the absence of an adopted, or even draft, policy with numeric thresholds, this assessment relies on guidelines published by the Governor's Office of Planning and Research (OPR) in analyzing the project's effects on VMT. OPR provides screening threshold recommendations that are intended to identify when a project should be expected to cause a less-than-significant impact without conducting a detailed VMT evaluation. Refer to page 12 of the 2018 *OPR Technical Advisory on Evaluating Transportation Impacts in CEQA* (available online at: [https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)). As stated on page 11-12 of the RDEIR, per the OPR recommendation, land use projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. Therefore, per the OPR recommendation, it can be presumed that the project (including the proposed bus shuttle) would have a less-than-significant transportation impact on VMT.
9. The traffic analysis was conducted when COVID-19 restrictions were in place. The Keith Higgins report is available with a Public Records Act request, and has actually been released associated with such a request. Please refer to CRPA 2223\_39 found at: [https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/Responsiveness%20Documents%202223\\_39.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/Responsiveness%20Documents%202223_39.pdf)
10. This comment presents some parking numbers but does not ask a question or raise an environmental issue. Therefore, no response is necessary.
11. Figure 2 of the VMT report in Appendix J presents the temporary traffic control measures accurately recommended by Hexagon Transportation Consultants.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:11 PM

Subject: RDEIR FEEDBACK: Stadium Improvements should include Baseball (Students and Physical Structure) Site Photo

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 This RDEIR has significantly increased its scope of work from the draft EIR. This in itself should immediately halt the project and trigger a restart back to Scoping Session and Notice of Preparation. We'd like to understand if this is legal what you are doing? You've added entire new projects and NOT addressing the comments from the DEIR.

Given you changed the title to "stadium improvements" and have included the pool, we'd like to have the baseball fields and students part of this discussion. For too long, CUSD has not done proper planning of long-term growth at the high school campus. This RDEIR is another example of a bunch of initiatives stuck together with no vision or planning through the thoughtful process of the Facilities Master Plan. How can you be proposing millions of dollars of improvements and neglect basics?

**Request:**

- Can you provide transparency and inclusion of the baseball team in the athletic stadium assessment: Schedules, number of students?
- Why are you not considering the option of using the baseball field as an alternative to parking lots versus the Tennis courts (transparency of what is wrong with current tennis courts and cost to fix)?
- Can you provide Inclusion of baseball students in the VMT/Energy/GHG analysis and comparative to the other groups; football, tennis, softball, soccer?
- Can you provide options and evaluation to fix, update and connect the baseball field to the back-side of the stadium (see photo of current disaster - stairs in need of repair that walk up to the stadium field - is this even safe?)
- Why can't the stairs in this photo be fixed as usable stairs to the stadium at the upper level? Why can't the baseball fields be parking lot vs. tennis courts?



## Response to Letter 14-4-n, Bud Get

1. Regarding the NOP, see response to Letter 14-2-c, comment 2. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. Regarding improvements to the baseball field, improvements to the baseball field are not included in the project description as such improvements are not part of the proposed project scope. Likewise, alleged issues with the baseball field stairs are outside the scope of the proposed project and RDEIR. Many of the project components are from the 2019 Facilities Master Plan including the stadium lights, the storage room and viewing platform, and the parking lot replacement of the tennis courts (refer to Section 4.0, Project Description, under “Stadium Improvements” and “New Parking Lots” for additional discussion of the proposed project’s consistency with the 2019 facilities master plan).

Regarding converting the baseball field to parking instead of the tennis courts, see response to Letter 14-2-o, comment 2.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:15 PM

Subject: RDEIR Comments: Baseline Surrounding Neighborhood Conditions for School Crossings

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

Several critical baseline conditions are missing in describing the neighborhood conditions surrounding CHS.

- You omit the fact CHS is very absent from having the ideal safe school zone markings and has had a history of chronic challenges with the high concentration of school-generated traffic around the school campus.
- Baseline: Please include a more accurate description and visual photos for all the school crossing signs, speed signs, school zone markings and other traffic calming devices to remind drivers to treat the area with special care and conditions.
- Your proposed mitigation measures regarding Traffic Management are not credible, feasible and very temporary. This is especially true if CUSD hasn't put in permanent day-to-day traffic management plans to address the chronic conditions neighbors have been complaining about for YEARS!

2

Please address the current baseline environmental settings that are absent from a "Safe Routes to School Assessment" :

- 1) What is the school enrollment boundary? Identify and show us on a map the entire zone around the school from which students are drawn. This should be the environment impact zone for the RDEIR.
- 2) What is the school walk zone? Is this school walk zone currently defined by state or local policy? What is that? Show us a visual of the walk zone? This is a critical input into the Transportation, Gas, Energy sections? How will these metrics feed and/or change with RDEIR?
- 3) What is the current school bus service? Where are students coming from with buses? What percentage of students are driving vs. taking school bus? These inputs provide foundational considerations into the RDEIR in all areas of transportation, energy, GreenHouse Gas?
- 4) Please be more descriptive and show visuals of the school zone immediately adjacent to the school. What is lacking; stronger crossing signs, speed signs, school zone pavement markings, no overhead school Flasher limit signs exist, no changeable Message sign exists, no speed feedback sign exists, no school advance warning and crosswalk signs exist. No pavement marking exist.
- 5) What are the historical violations in the areas from speeding and parking?

In other words, CUSD has not applied any Safe Route Planning:

[http://guide.saferoutesinfo.org/engineering/the\\_school\\_zone.cfm](http://guide.saferoutesinfo.org/engineering/the_school_zone.cfm)

Alternative: <http://guide.saferoutesinfo.org/steps/index.cfm>

- What pro-active mitigation measures and steps can CUSD take to Create Safe Routes to School Programs so that there are credible baselines for introducing additional chaos of traffic, safety and parking to an already challenged location?



## Response to Letter 14-4-o, Bud Get

1. This comment is regarding existing signs at the school and in the surrounding neighborhood and is not relevant to the environmental analysis in the RDEIR.
2. Regarding safe routes to schools, a Safe Routes to School plan is not required for the proposed project. Baseline methods of transportation to campus for practices and games is identified in Section 3.0, Environmental Setting, and Section 11.0, Transportation and Parking, of the RDEIR. No changes to the RDEIR are required.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:11 PM

Subject: RDEIR Feedback Assess Long-term Growth at CMS

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 Alternative 4: Long-term Planning for SAFE and Responsible Growth for Stadium and Athletic Improvements:

Please be transparent on current state of CHS campus: Overbuilt, not enough parking even with proposed parking lots, not safe (surrounded by areas you can't touch or grow like Scenic Highway 1 and Residents).

Please answer ALL the QUESTIONS and COMMENTS in RED in the slide below.

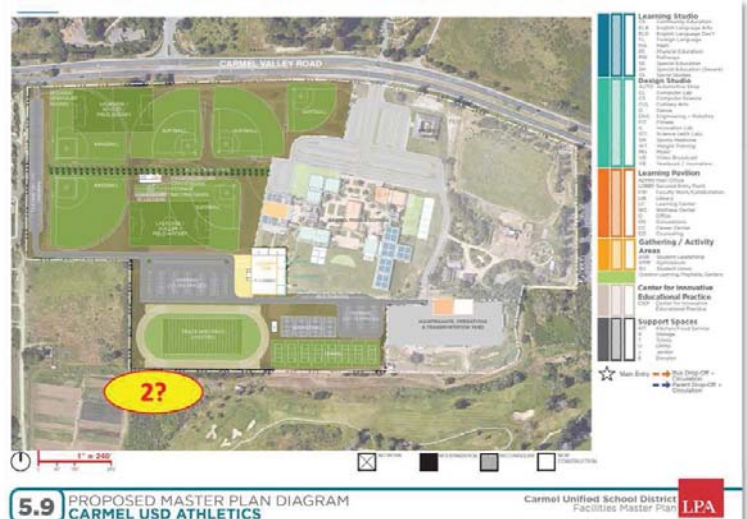
Be responsible for long-term growth !

**CURRENT: Alternative 4 should be HERE at 1!**



**2 CURRENT: Why not move CHS Baseball here and replace CHS Baseball with parking lots?**

QUESTION: 2019 FMP: Where is Alternative "Move to CMS being assessed from? #2?  
 QUESTION: Are you isolating the Alternative assessment to just stadium lights?  
 ALTERNATIVE for REDIR: Keep Soccer here vs. move to CHS? Why not?  
 QUESTION Who says this FMP design is final enough for proper Alternative Evaluation?  
 QUESTION: Why not Re-start Facilities Master Plan! Re-start Scoping Session!  
 If you want large scale "stadium improvements" do it right, ONCE and long-term!



5.9 PROPOSED MASTER PLAN DIAGRAM  
 CARMEL USD ATHLETICS

Carmel Unified School District  
 Facilities Master Plan LPA

## Response to letter 14-4-p, Bud Get

1. The comment is repetitive of general comments previously stated by the commenter, as addressed above. The commenter supports Alternative 4, which consists of constructing a lighted stadium at Carmel Middle School. This alternative is evaluated in Section 18.0, Alternatives. No changes to the RDEIR are necessary.

----- Forwarded message -----

Letter #14-4-q

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:16 PM

Subject: RDEIR: Stadium Improvements Should Include Baseball Fields (immediately adjacent to football with broken stair and new batting cages)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 This RDEIR has significantly increased its scope of work from the draft EIR. This in itself should immediately halt the project and trigger a restart back to Scoping Session and Notice of Preparation. We'd like to understand if this is legal what you are doing? You've added entire new projects and NOT addressing the comments from the DEIR.

Given you changed the title to "stadium improvements" and have included the pool, we'd like to have the baseball fields and students part of this discussion. For too long, CUSD has not done proper planning of long-term growth at the high school campus. This RDEIR is another example of a bunch of initiatives stuck together with no vision or planning through the thoughtful process of the Facilities Master Plan.

**Request:**

- 2 - Both Karl Pallastrini and Sara Hinds approved Baseball Practice Area Improvements without a CEQA and Notice of Exemption. Can you provide e-mail and community complaints that this installation is NOT working for our community?
- We'd like to request the batting cages move to CMS as part of the improvement process.
- What is the baseball schedule like at CHS, number of students, games, etc?
- How does that student set compare to others identified in the RDEIR? football, softball, tennis, etc?
- Can we assess the value of the baseball field in the current location vs. moving them to CMS and keeping the tennis courts?

**RESOLUTION NO. 19-37**

**BEFORE THE BOARD OF TRUSTEES  
OF CARMEL UNIFIED SCHOOL DISTRICT**

<b>In the matter of:</b> <b>CARMEL HIGH SCHOOL</b> <b>BASEBALL PRACTICE</b> <b>AREA IMPROVEMENTS</b>	) ) ) ) ) )	<b>RESOLUTION</b> <b>AWARDING CONTRACT</b>
---------------------------------------------------------------------------------------------------------------	----------------------------	-----------------------------------------------

WHEREAS, Carmel Unified School District received bids for **Carmel High School Baseball Practice Area Improvements** ("Project") on Tuesday, October 15, 2019 at 1:00 PM;

WHEREAS, the District solicited bids for the Project;

WHEREAS, **Granite Construction Company** submitted the lowest base bid for the Project (Exhibit A); and

NOW, THEREFORE, the Board of Trustees of Carmel Unified School District finds and resolves as follows:

1. The foregoing recitals are true and correct.
2. Granite Construction Company bid is accepted as the lowest responsive base bid by a responsible bidder. Accordingly, the District hereby awards the base bid in the total amount of \$273,870.84 to Granite Construction Company.

The foregoing Resolution was approved at a duly called meeting of the Carmel Unified School District Board of Trustees on the 23rd day of October, 2019, by the following vote:

AYES: 3  
 NOES: 0  
 ABSENT: 2  
 ABSTAINED: 0

Dated: October 23, 2019



Karl Pallastrini  
President, Board of Trustees  
Carmel Unified School District  
Monterey County, California

**Certification by Clerk to the Board**

As Clerk to the Board, I hereby certify that the attached Resolution is a true and correct copy of the Resolution duly adopted by the Board of Trustees of Carmel Unified School District on the 23<sup>rd</sup> day of October, 2019

Dated: October 23, 2019



Sara Hinds  
Clerk Board of Trustees  
Carmel Unified School District  
Monterey County, California



## Response to Letter 14-4-q, Bud Get

1. Regarding the NOP, see response to Letter 14-2-c, comment 2. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. Regarding improvements to the baseball field, improvements to the baseball field are not included in the project description. Please refer to response Letter 14-4-n, comment 1.
2. This comment, and the attached resolution, is regarding previous improvements at the baseball field. Past projects are not the subject of the RDEIR. It is not associated with the proposed project and therefore, no response is necessary. The commenter requests other improvements that are not included in the project description. Therefore, no response is necessary.



----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:17 PM

Subject: RDEIR Feedback: Quiet Morse Street (NO LIGHTS, SIDEWALK) Implication to Site

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

This is what our streets should look like but it's CONSISTENTLY invaded with EVERY game for the last 10 years since you built the performing art center, pool and science wing with a CEQA!  
Providing this photo as part of the record to visually demonstrate what the neighborhood looks like.

Can you provide insight on how this will be safe at night?



## Response to Letter 14-4-r, Bud Get

1. This comment is not regarding the proposed project and does not raise an environmental issue and therefore, no response is necessary. Please also see response to Letter 10c, comment 3, and response to comment 3 for Letter 2b.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:23 PM

Subject: RDEIR: Alternative Fix the Pool Lights

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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Isn't this a construction discussion? Why is Late Start part of the Alternative "cards"?  
 Can you include Alternatives that only have the Project Characteristics? Isn't that the requirements?  
 Is Late start an objective? Not a Project Characteristic?  
 You are mixing apples with oranges in your alternatives.  
 It's pretty easy, just fix the pool lights. It's the only logical Project Characteristic that makes any sense.

Please consider the below as an Alternative. It is the most environmentally best alternative.

Alternative: Fix the Pool Lights!		
	4.1 Project Characteristics (Page 72)	Environmental Impact Comments
1	NO: Stadium field lights	Significant and Unavoidable: Even after Mitigation
2	NO - NEW! Viewing platform/storage building	Undetermined: In concept stage, however - it encourages more spectators and increases VMT, GHG, etc.
4	NO - NEW! Parking lot: 76 spaces replacing tennis courts	Significant and Unavoidable: Even after Mitigation: Current in concept but environmentally brings more cars, butts up against protected Scenic Highway 1, jeopardizes protected trees, Tennis students are punished with more VMT.
5	NO - NEW! 18-foot Roadway	Significant and Unavoidable: Even after Mitigation
3	NO - NEW! Parking Lot: 35 standard spaces east pool	Undetermined: Not needed if stadium light is not approved (RDEIR = Stadium Athletic Improvements)
6	NO - NEW! Pedestrian: access to baseball field	Undetermined: Not needed if stadium light is not approved (RDEIR = Stadium Athletic Improvements)

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7	NEW! Replacing light fixtures at the swimming pool.	IMPROVES Environment Impact:
		The resultant maximum candela for the existing HID lights was about 44,000 candelas existing at grade, and it was about 80,000 candelas existing taken at 15 feet below elevation
		The resultant maximum candela for LED was about 17 candelas at grade and 341 candelas at 15 feet below elevation
		The proposed pool light fixtures, therefore, represent a decrease of 43,983 candelas at grade and 79,659 candelas at 15 feet below elevation.
		Minimize neighborhood lighting nuisance by greatly reducing local spill and glare;
		Manage high angle light pollution, thus dramatically decreasing off-site light trespass and sky glow;
		Mitigate neighborhood light pollution and sky glow, which will benefit the environment, the astronomy community, and others impacted by poorly designed outdoor sports facilities; and Minimize lumen densities, thereby reducing energy consumption.

## Response to Letter 14-4-s, Bud Get

1. The commenter's opinion is to fix the pool lights and nothing else. The District's Governing Board has the discretion to approve replacing the pools facility lights to reduce the current impact of these lights, separately from consideration of the stadium lights. It does not have to be evaluated as an alternative in the EIR. No changes to the RDEIR are necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:25 PM

Subject: RDEIR FEEDBACK: Traffic Circulation, Safety and Going Green!

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

## PROBLEM

PAGE 292: You state:

*To facilitate access to available on-campus parking and to prevent excessive queueing onto SR 1 and possibly inhibiting emergency access vehicles during this limited time period, the school district will implement a traffic management plan (TMP). A TMP consists of specific programs, information, encouragement, and incentives by an organization to educate people on available transportation options and ensure said options are utilized. TMP programs are typically designed to encourage modes other than driving alone, and to counterbalance the incentives to drive, like free parking and vehicle-oriented roadway design. There are both traditional and innovative technology-based methods to provide TMP measures.*

PAGE 277: You state

*A comment letter was received from the Transportation Agency for Monterey County (TAMC) (dated June 14, 2021), 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*

PAGE 279: You state

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



PAGE 283: You State:

*Issues or Potential Impacts not Discussed Further Conflict with Transportation Programs, Plans, Ordinance, or Policy Leading to Adverse Impacts*  
*Implementation of the project would not require the construction, re-design, or alteration of any public roadways outside of the Carmel High School campus; and thus, would not adversely affect any existing or planned transit, bicycle, or pedestrian facilities. Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing transit, bicycle, and pedestrian facilities. This issue is not discussed further.*

**MITIGATION MEASURE**

We **completely disagree** that the topic of transportation, traffic circulation and improvements of current and future impacts should not be discussed further. If you want to improve traffic circulation as stated in the Project Objectives, you must conduct **a Zone Circulation Study**. You must acknowledge that you have a current problem that probably has serious implications to emergency vehicle access. You must establish a baseline that is accurately captured in the Environment Setting. You must strive for safety, You must improve safe pedestrian and traffic patterns. **We require a Zone Circulation study within 5 miles of the campus**, during school start and end time and comprehensive and integrated community engagement throughout the process. Solutions should include but not be limited to:

GOAL: Providing a safe travel environment is paramount for encouraging children, parents, and staff to walk and bike to and from school. With student safety as a fundamental principle, please commission a School Zone Circulation Study, which reviews current traffic patterns within the school campus and on adjacent municipal streets. The goals of this Circulation Study are to reduce congestion, address safety concerns, and enhance access for pedestrians and bicyclists. The study area includes Carmel High school and all surrounding road network residential and Scenic Highway 1. The School Zone Circulation Study will identify existing volumes and traffic patterns for: • Pedestrian and bicycle movements • Vehicle movements • Student pick-up and drop-off • Bus operations and staging • Visitor, School faculty/staff parking With a thorough analysis of existing conditions at the school campus, this study should help to identify solutions to address safety, congestion, and access issues and explores alternatives to better utilize school property and public right-of-way to encourage walking and cycling to school. You should not be allowed to add on additional parking lots without this investment and benchmarking. CHS has chronic problem currently that is not being addressed.

The goal of this School Zone Circulation Study would be to create a coordinated system of

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mobility among all modes by identifying existing deficiencies and providing recommendations to enhance the safety, efficiency, and coordination among pedestrians, bicyclists, vehicles, and buses. This should study focus on the following points to guide the development of recommendations: • Maintain a safe campus • Reduce the potential for conflicts among pedestrians, bicyclists, buses, and motorists • Improve vehicular traffic circulation during peak morning and afternoon student drop-off and pick-up times. • Comply with state and federal guidelines. • Improve pedestrian access with Americans with Disabilities Act (ADA) accessible facilities. • Improve surrounding roadway facilities to encourage walking and biking to school.

You **MUST CAPTURE EXISTING CONDITIONS** Accurately. Provide a snapshot of the current traffic circulation patterns both on campus and along the adjacent roadway network. This information should be collected through discussions/surveys with residential members within 5 miles, field observations, traffic counts and circulation observations conducted by traffic engineers, and conversations with school district representatives and school staff.

Please include Collision data that can be obtained from some type of Transportation Injury Mapping System (TIMS). Show this in a figure representation with each representing a single reported accident (over 10 year history). All reported collisions occurring between 2012-2022 should be included. What trends have emerged from the data?

Your traffic counts must be conducted at the **study intersections (Scenic Highway 1, North Carmel Hills and residential streets) during the peak traffic periods associated with school start and dismissal times**. What is the peak 15 minute traffic volume? What are the significant queue during school start and dismissal times? We **CONSISTENTLY** observe the longest queue (550') during the AM PM school start and dismissal times period in the northbound right-turn lane which used as line-up up to 15 minutes before school is dismissed. The significant queue is a result of the parking lot being full and drivers simply choosing to wait in the right-turn lane. We don't believe increasing the parking capacity is a resolution. The campus is limited in growth.

## Response to Letter 14-4-t, Bud Get

1. The commenter is requesting a “Zone Circulation Study” to determine if the existing conditions at the high school and vicinity are safe. The comment is not about the proposed project, and does not raise an environmental issue. Baseline conditions are set forth in Subsection 11.1, Environmental Setting. The proposed project does include the addition of 111 parking spaces to improve on-site circulation. Additionally, Mitigation Measure 11-4 requires preparation and implementation of the Traffic Management Plan during the highly-attended games. No changes to the RDEIR are required.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:24 PM

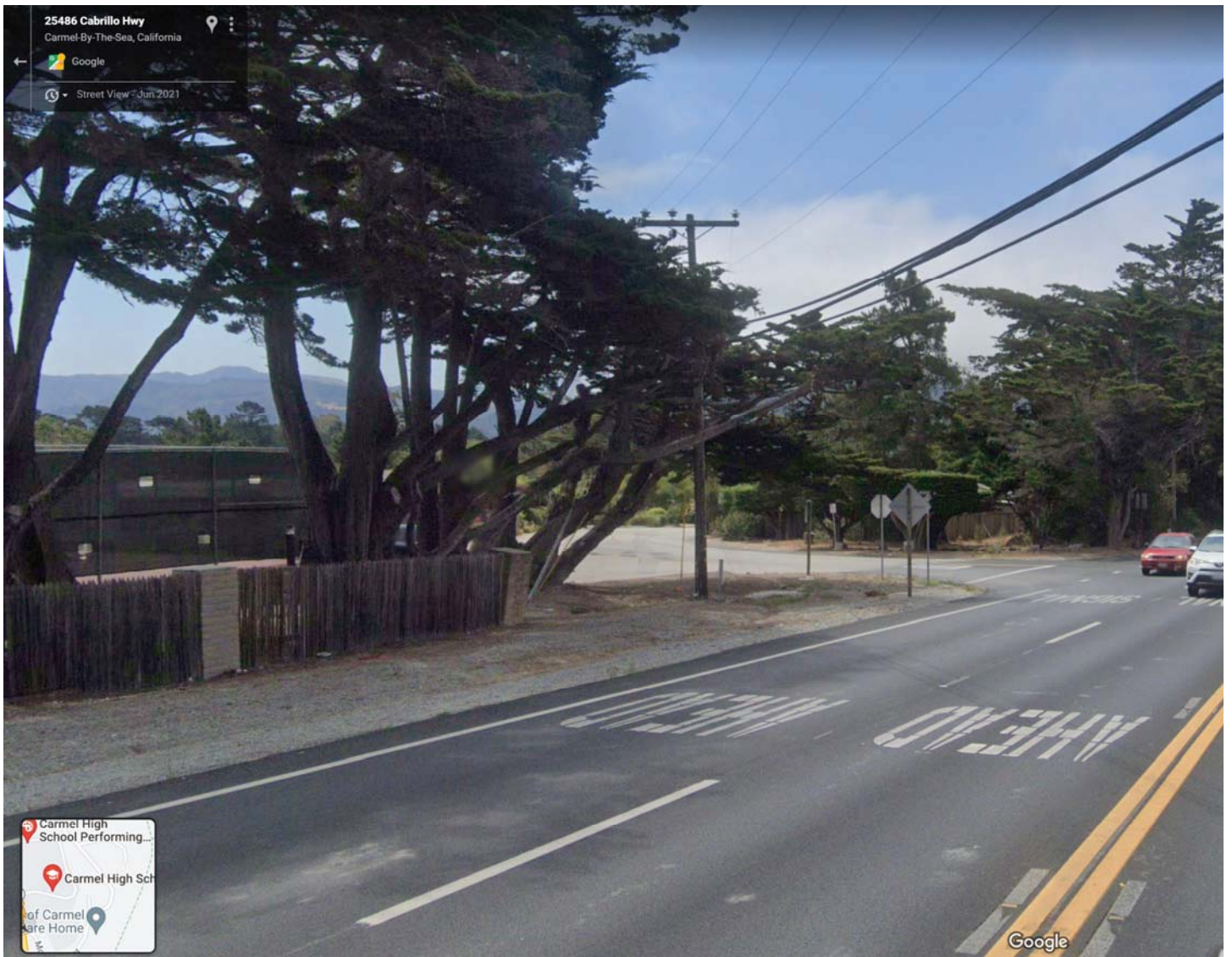
Subject: RDEIR: Morse Drive from Highway 1 (photo of impacted area)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

This is the dangerous left turn on to Morse Drive. No stop light or safe turn.  
This is the residential street where overflow parking is going. No Sidewalks or lights!

What is your mitigation plan for that turn into Morse?



## Response to letter 14-4-u, Bud Get

1. This comment is regarding turns at Morse Drive. The south entrance/exit to the tennis court parking lot will be on school district property, which will allow the school to close it and direct all traffic to the controlled intersection at State Route 1 and Ocean Avenue during events. The tennis court parking lot can then be accessed from the main parking lot.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:25 PM

Subject: RDEIR: NEW Scope of Works are not stable, final or detailed enough

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

## Description of the Proposed Project

The proposed project must be described in a way that will be meaningful to the public, to the other reviewing agencies, and to the decision-makers. In accordance with the CEQA Guidelines, the description must include:

1. Precise location and boundaries of proposed project on a detailed map, preferably topographic,
2. Project location must also appear on a regional map,
3. Statement of objectives and the underlying purpose of the project and may discuss the project benefits. (Note: This is the same as the purpose and need statement under NEPA.)
4. Statement of the project's technical, economic, and environmental characteristics given the current design,
5. Statement of the intended uses of the EIR, including a list of responsible agencies that will use the document to support their decisions, a list of permits and approvals needed to implement the project and a list of related environmental reviews and consultations (local, state and federal).

**ALL THE NEW ADDED SCOPE DOESN'T MEET THE ABOVE REQUIREMENTS: NO DETAILS PROVIDED in specs, materials, etc. Not meaningful enough to drive decision making. How are we supposed to assess?**

- NEW: 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



## Response to Letter 14-4-v, Bud Get

1. This comment quotes CEQA requirements and lists some proposed project components. The details of the project components are provided in both text and graphics in Section 4.0, Project Description, of the RDEIR. The text and graphics presenting the proposed project are in sufficient detail to evaluate the associated environmental effects. No changes to the RDEIR are necessary.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:26 PM

Subject: RDEIR Feedback: Stadium Improvements Should Include all areas of Baseball Field and Students (including this photo of the Entrance Gate and Lane)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

**PROBLEM:**

It's unclear how you propose to connect additional parking spaces, lots etc to the already existing stadium footprint in ways that are safer or better.

**Mitigation Measures:**

- Can you show us the current Emergency Access Routes in these areas and how do you propose to change them?
- Clearly make available and transparent what is the route that exists, how would you change and why you don't have any issues
- Provide information on why DSA has no records of any 810 Fire and Life Safety Forms with any of your construction?



## Response to Letter 14-4-w, Bud Get

1. Past projects are not the subject of the RDEIR. Regarding emergency access routes, ingress and egress, as well as internal circulation, for everyday or for emergencies is presented in Figure 4-1, Overall Site Plan, Figure 4-6, Post Development Overall Parking Exhibit, and response to Letter 14-2-f. No changes to the RDEIR are required.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:27 PM

Subject: RDEIR Feedback: Assumption inputs into a 3.24 Persons Vehicle Assumption

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

PAGE 286: You reference several key reports as your validation of inputs to confirm if the 3.24 persons per vehicle is a reasonable assumption for high school football games

You have provided access to the following high school stadium project CEQA documents were reviewed regarding persons per vehicle:

- Los Alto High School Lights & Public Address System EIR (Los Altos) (2020) 3.24 persons per vehicle (used Mitty High School data);
- Mountain View High School Field Lighting EIR (Mountain View) (2020) 3.24 persons per vehicle (used Mitty High School data);
- Bonita Vista High School Track & Field Project EIR (Chula Vista) (2021) 3.5 persons per vehicle;
- Leuzinger High School IS/MND (Lawndale) (2021) 2 persons per vehicle;
- Grant Union High School IS/MND (Sacramento) (2021) average of 3 persons per vehicle;
- Chavez High School Stadium Seating Expansion (Stockton) (2008) 4.17 persons per vehicle;
- Concord High School and Clayton Valley High School (Concord) (2015) 2.17 persons per vehicle;
- Valley High School Sports Complex (Costa Mesa) (2014) 4.0 persons per vehicle; and
- Hiram Johnson High School Athletic Improvements MND (Sacramento) (2022) 3.4 persons per vehicle.

However, how do we know any of these schools are similar to CHS in any criteria?

- What are the number of available parking spots for each campus?
- What are the number of students for each school?
- What are the number of sporting attendees for each event?
- Do they have a shuttle system in place?

## Response to Letter 14-4-x, Bud Get

1. Regarding the 3.24 persons per vehicle used in the ADEIR analysis of Vehicle Miles Traveled (VMT), see response to Letter 14-3-j, comment 1.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:30 PM

Subject: RDEIR: Access to Information, Email and Inputs from Project Description Sources

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 We'd like to have access and insight into the written records available for the Project Description Sources.

Since this is listed as a key reference in the RDEIR, we'd like to understand the value and knowledge being provided to the project.

Please provide for review.

#### **4.0 Project Description Sources**

Anderson, Golden, Athletic Director, Carmel High School. E-mail message to consultant, 28 April 2021 and 8 August 2022.

Carmel Unified School District and LPA. Carmel Unified School District Facilities Master Plan

2019. Available online: <https://www.carmelunified.org/Page/6080>

Crookham, Bob, Musco Sports Lighting. E-mail message to consultant, 6 July 2021; phone conversation with consultant, 18 August 2022.

Lee, Katie, P.E. Whitson Engineers. E-mail message to consultant, 14 July 2022; 22 July 2022; 15 August 2022.

Musco Lighting. January 25, 2022a. Carmel Pool Retrofit, Carmel, CA (Pool LED and Football LED) Project Summary and Illumination Summary. Oskaloosa, IA.

???. January 25, 2022b. Carmel Pool Retrofit, Carmel, CA (Pool HID with Football LED) Project Summary and Illumination Summary. Oskaloosa, IA.

???. November 22, 2021a. Carmel Pool Retrofit, Carmel, CA, Illumination Summary. Oskaloosa, IA

???. June 16, 2021b. Carmel High School Football, Carmel, CA – Project Summary, Illumination Summary, and Equipment Layout. Oskaloosa, IA.

???. April 29, 2021c. Carmel High School Football – Control System Summary. Oskaloosa, IA.



1  
con't.

???. May 5, 2021d. Carmel High School Football, Carmel, CA – Pole Configuration Drawing. Oskaloosa, IA.

National Oceanic and Atmospheric Administration (NOAA). 2021. NOAA Solar Calculator website. Accessed June 14, 2021. <https://gml.noaa.gov/grad/solcalc/>

Paul, Dan, Director of Facilities & Transportation, Carmel Unified School District.  
E-mail messages to consultant, 11 May 2021; 9 June 2021; 25 June 2021; 20 May 2022; 15 June 2022; 13 July 2022; 26 July 2022; 28 July 2022; 29 July 2022; 1 August 2022; 2 August 2022; 3 August 2022; 4 August 2022; 5 August 2022; 8 August 2022; 9 August 2022; 10 August 2022; 11 August 2022; 12 August 2022; 13 August 2022; and 22 August 2022.

Carmel High School Stadium Improvements Revised Draft EIR  
EMC Planning Group Inc. 20-3

Scates, Kenneth, AIA, LEED AP, HGHB Architecture. Email message to consultant, 5 May 2021; 15 June 2022; 22 July 2022; 15 August 2022.

Whitson Engineers. August 12, 2022a. Carmel High School Tennis Court Parking – Conceptual Design. Monterey, CA.

???. July 8, 2022b. Carmel High School East Parking Lot – Conceptual Design. Monterey, CA.

???. August 10, 2022c. Carmel High School Post Development Overall Parking Exhibit. Monterey, CA.

## Response to Letter 14-4-y, Bud Get

1. Many of the sources requested by this comment were either included in the RDEIR or provided via web links. A summary of where to find these sources is provided below:

- Anderson, Golden, Athletic Director, Carmel High School. E-mail message to consultant, 28 April 2021 and 8 August 2022.

Available via CPRA Request 2223\_29 and 2223\_30 online at:

[https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223\\_29.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223_29.pdf)

[https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223\\_30%20Responsive%20Documents.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223_30%20Responsive%20Documents.pdf)

- Carmel Unified School District and LPA. *Carmel Unified School District Facilities Master Plan 2019*. Available online at: <https://www.carmelunified.org/Page/6080>
- Crookham, Bob, Musco Sports Lighting. E-mail message to consultant, 6 July 2021; phone conversation with consultant, 18 August 2022.

Available via CPRA Request 2223\_29 and 2223\_30 online at:

[https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223\\_29.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223_29.pdf)

[https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223\\_30%20Responsive%20Documents.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223_30%20Responsive%20Documents.pdf)

- Lee, Katie, P.E. Whitson Engineers. E-mail message to consultant, 14 July 2022; 22 July 2022; 15 August 2022.

Available via CPRA Request 2223\_29 and 2223\_30 online at:

[https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223\\_29.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223_29.pdf)

[https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223\\_30%20Responsive%20Documents.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223_30%20Responsive%20Documents.pdf)

- Musco Lighting. January 25, 2022a. Carmel Pool Retrofit, Carmel, CA (Pool LED and Football LED) Project Summary and Illumination Summary. Oskaloosa, IA.

———. January 25, 2022b. Carmel Pool Retrofit, Carmel, CA (Pool HID with Football LED) Project Summary and Illumination Summary. Oskaloosa, IA.

———. November 22, 2021a. Carmel Pool Retrofit, Carmel, CA, Illumination Summary. Oskaloosa, IA

———. June 16, 2021b. Carmel High School Football, Carmel, CA – Project Summary, Illumination Summary, and Equipment Layout. Oskaloosa, IA.

———. April 29, 2021c. Carmel High School Football – Control System Summary. Oskaloosa, IA.

———. May 5, 2021d. Carmel High School Football, Carmel, CA – Pole Configuration Drawing. Oskaloosa, IA.

All Musco plans referenced above are available in Appendix B and C of the RDEIR.

- National Oceanic and Atmospheric Administration (NOAA). 2021. NOAA Solar Calculator website. Available online: <https://gml.noaa.gov/grad/solcalc/>
- Paul, Dan, Director of Facilities & Transportation, Carmel Unified School District. E-mail messages to consultant, 11 May 2021; 9 June 2021; 25 June 2021; 20 May 2022; 15 June 2022; 13 July 2022; 26 July 2022; 28 July 2022; 29 July 2022; 1 August 2022; 2 August 2022; 3 August 2022; 4 August 2022; 5 August 2022; 8 August 2022; 9 August 2022; 10 August 2022; 11 August 2022; 12 August 2022; 13 August 2022; and 22 August 2022.

Available via CPRA Request 2223\_29 and 2223\_30 online at:

[https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223\\_29.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223_29.pdf)

[https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223\\_30%20Responsive%20Documents.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223_30%20Responsive%20Documents.pdf)

- Note: the comment references: “Carmel High School Stadium Improvements Revised Draft EIR EMC Planning Group 20-3.” This is in reference to the header/footer and page number of the RDEIR where the source list was copy and pasted from. No response is necessary.
- Scates, Kenneth, AIA, LEED AP, HGHB Architecture. Email message to consultant, 5 May 2021; 15 June 2022; 22 July 2022; 15 August 2022.
- Available via CPRA Request 2223\_29 and 2223\_30 online at:  
[https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223\\_29.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223_29.pdf)  
[https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223\\_30%20Responsive%20Documents.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223_30%20Responsive%20Documents.pdf)

- Whitson Engineers. August 12, 2022a. Carmel High School Tennis Court Parking – Conceptual Design. Monterey, CA.

Refer to Figure 4-10, Tennis Court Parking Lot – Conceptual Design, of the RDEIR.

———. July 8, 2022b. Carmel High School East Parking Lot – Conceptual Design. Monterey, CA.

Refer to Figure 4-8, East Parking Lot – Conceptual Design, of the RDEIR.

———. August 10, 2022c. Carmel High School Post Development Overall Parking Exhibit. Monterey, CA.

Refer to Figure 4-6, Post Development Overall Parking Exhibit, of the RDEIR.

In connection with our review and response to this comment, source documents specifically identified in this comment, as well as source documents referenced elsewhere in the RDEIR, were reviewed. As part of this process, a typographical error was found in the RDEIR. Specifically, a source listed in the RDEIR sources section (Section 20.0), under “Section 18.0, Alternatives,” was listed incorrectly. Therefore, this source has been removed from the RDEIR and this change is reflected in Section 3.0, Changes to the RDEIR, of this final EIR.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:29 PM

Subject: RDEIR Feedback: Stated Objective is Traffic Circulation (Photo of Impacted Area)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1



If your stated objective is traffic circulation, can please include more information on the current traffic flow including what is happening on Scenic Highway 1?

Above photo shows limited ability for CUSD to improve traffic circulation - surrounded by 22 acres with no growth potential next to protected Scenic Highway 1.

Your entrance is small and traffic currently overflows to neighborhood streets.

## Response to Letter 14-4-z, Bud Get

1. This comment is regarding existing traffic circulation. Baseline conditions are addressed in Subsection 11.1, Environmental Setting, of Section 11.0, Transportation and Parking, of the RDEIR. The proposed project includes the addition of 111 on-site parking spaces to assist with alleviating campus-related parking on adjacent public streets. No changes to the RDEIR are required.



----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:31 PM

Subject: RDEIR FEEDBACK: Traffic Circulation (Site Photo for the Record)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

**If your stated objection is to improve traffic circulation on campus, please describe the current state.**

- What is wrong with the traffic circulation, what are you trying to improve and how do you know you will have achieved it?
- Please include how wide is the current entrance to Carmel High School?
- How often does traffic get backed up to Scenic Highway 1?
- What is your on-campus circulation? Where are your pick-up and drop offs?
- By adding parking spaces, how would that improve circulation? Isn't that just adding and encouraging more VMT?
- Can you provide specific measurements of the front entrance of CHS Campus? Photos indicate limited two way flow with hindered ability for traffic circulation.
- This is consistently backed up on Scenic Highway 1. NOT safe. Be honest, this is horrible now. Adding parking spaces won't help because your traffic circulation is not solvable.



## Response to Letter 14-5-a, Bud Get

1. This comment is regarding on-campus circulation and overflow into the neighborhood. The proposed project includes the addition of 111 on-site parking spaces to assist with alleviating campus-related parking on adjacent public streets. The driveway entrance to the campus at Ocean Avenue is approximately 41 feet wide; at N. Carmel Hill Drive is 29 feet wide; at N. Doris Watson Place is 21 feet wide; and at the main campus parking lot 25 feet (entrance lane) and 30 feet (exit lane). Please also see response to Letter 14-2-f. The remaining comments do not concern an environmental issue. No changes to the RDEIR are required.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:35 PM

Subject: RDEIR Feedback: Notice of Preparation (Page 8 ) States " No additional Improvements are proposed"

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

## 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).

On Page 8 of the Notice of Preparations, You clearly made the following statement: **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**

- What happened between the Notice of Preparation to the RDEIR that the scope of work increased so significantly?
- How do you go from "no additional improvements are proposed" to millions of dollars of new work?

## Response to Letter 14-5-b, Bud Get

1. This comment is about expanding the project description after release of the original draft EIR. See response to Letter 11b, comment 3 and comment 16, Letter 14-1-u, comment 1, and Letter 14-2-o, comment 1.



From: Bud Get <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:36 PM

Subject: RDEIR Feedback: Stadium Improvements include Baseball Fields and Students: Site Photo for the Record

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

This RDEIR has significantly increased its scope of work from the draft EIR. This in itself should immediately halt the project and trigger a restart back to Scoping Session and Notice of Preparation. We'd like to understand if this is legal what you are doing? You've added entire new projects and NOT addressing the comments from the DEIR.

Given you changed the title to "stadium improvements" and have included the pool, we'd like to have the baseball fields and students part of this discussion. For too long, CUSD has not done proper planning of long-term growth at the high school campus. This RDEIR is another example of a bunch of initiatives stuck together with no vision or planning through the thoughtful process of the Facilities Master Plan.

**Request:**

- Transparency and inclusion of the baseball team in the athletic stadium assessment: Schedules, number of students
- Inclusion and option of using the baseball field as an alternative to parking lots versus the Tennis courts (transparency of what is wrong with current tennis courts and cost to fix).
- Inclusion of baseball students in the VMT/Energy/GHG analysis and comparative to the other groups; football, tennis, softball, soccer
- Options and evaluation to fix, update and connect the baseball field to the back-side of the stadium (**see photo of current disaster - stairs in need of repair that walk up to the stadium field - is this even safe?**)
- Why can't the stairs be fixed as usable stairs to the stadium at the upper level? Why can't the baseball fields be parking lot vs. tennis courts?

This is a zoom out view of the disaster you are not addressing in the total athletic stadium improvements. You are so focused on just getting the stadium lights you are not being responsible and accountable for big picture thinking.

Why is this not part of the scope? What isn't the baseball field up for re-locating to CMS? It's just fields no hardscape?



## Response to Letter 14-5-c, Bud Get

1. This comment is about making improvements to the baseball field and facilities, which is not part of the proposed project. Please refer to response to Letter 14-1-g, comment 4, Letter 14-4-n, comment 1, and Letter 14-1-u, comment 1. Therefore, no response is necessary.

For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:37 PM

Subject: RDEIR Feedback: Notification of Public Agencies (TAMC)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

**Given you significantly changed the Project Objectives AND the Project Characteristics AND won't acknowledge previous comments AND have re-started the Scoping/NOP have you also disregarded updating the agencies?**

**QUESTIONS:**

- **Did you submit new project plans and notify TAMC?**
- **Given the significant new scope, shouldn't their input be garnered earlier in the Scoping and NOP for their required review?**
- **You are not demonstrating good faith. You are misleading.**

**Transportation Agency for Monterey County (TAMC) (last dated June 14, 2021 in NOP and reference in DEIR but new scope not part of their assessment in RDEIR Update)**

- 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.

2

**PROBLEM:**

- Not enough information has been provided in the consideration of safe bicycle and pedestrian connections to the project site.
- Page 279: ***There are no sidewalks and bicycles facilities (i.e., bike lanes and bike routes) along State Route 1*** and most residential streets in the area, including Morse Drive and Carmel Hills Drive. Therefore, it is anticipated that a majority of attendees would drive to the school campus.

3

**MITIGATION MEASURES:**

- Activate engagement and capture improvement goals and commitments with The Transportation Agency for Monterey County (TAMC) who always working to improve access and safety for bicyclists and pedestrians in Monterey County. The Agency supports bicycle and pedestrian transportation with its Bicycle and Pedestrian Facilities Advisory Committee, the Monterey County Bike Plan, and the 2% Transportation Development Act (TDA) grant funding.
- Nominate staff including Principal Jonathan Lyons to attend meetings and become involved in solution for CHS Campus.

## Response to Letter 14-5-d, Bud Get

1. Regarding the NOP, a second NOP is not required when a lead agency revises and recirculates a draft EIR in response to public comments. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. This comment is regarding the Transportation Agency for Monterey County (TAMC) involvement in this CEQA process. TAMC received the Notice of Preparation and submitted a response, which is included in Appendix A of the RDEIR. TAMC received the original draft EIR. They did not provide any comments. TAMC also received the RDEIR, and did not provide a comment letter. With respect to notice provided to public agencies in general, please see response to Letter 14-3-m, comment 1. No changes to the RDEIR are necessary.
2. The commenter notes that “a majority of attendees would drive to the school campus” and comment that not enough information has been provided in the consideration of safe bicycle and pedestrian connections to the project site, and notes that there are no bike lanes/routes along State Route 1. These are existing conditions that are described on page 11-3 of the RDEIR. These comments are noted. The project does not include off-site pedestrian improvements, nor does it include bicycle improvements. Please refer to Section 11.4 of the RDEIR for further discussion. The comment does not raise an environmental issue regarding the project and therefore, no response is necessary.
3. This comment is regarding improving access and safety for bicyclists and pedestrians. The school district does not encourage walking and bicycling during after dark activities associated with the proposed project. See response to comment 2, above, and see also response to Letter 14-1-q, comment 2.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:31 PM

Subject: RDEIR: Current Status of Carmel High School and Safety

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

- 1 Can you speak to the current state of CHS safety and the surrounded conditions of safety that CUSD has not resolved to date?
- All the photos below show NO safe sidewalks, ONE cross walk way, HIGH Traffic and significant congestion that creates the condition for the death that happened below.
  - Why isn't CUSD pro-active on a Day-to-Day School Zone Program and Traffic Management Plan before introducing dangerous dark, activities? No trust that are organized enough to risk more lives.

2 <https://www.ksbw.com/article/girl-16-hits-pedestrian-near-carmel-high-school-1-dead/1050193>

CARMEL, Calif. —

Updated: 3:13 PM PDT Sep 7, 2012

A 16-year-old girl was driving near Carmel High School as were students arriving for their Friday school day when she hit and killed a pedestrian.

The teenage driver ran over a 55-year-old man with her Lincoln Navigator sport utility vehicle at 7:30 a.m., California Highway Patrol Officer Robert Lehman said.

### **Girl, 16, hits pedestrian near Carmel High School; 1 dead**

The girl, who is a junior at Carmel High, was attempting to make a left turn from Highway 1 southbound near Flanders Drive.

At the same moment, the man attempted to walk across the heavily traveled highway from the west side to the east side, even though he was not in a marked crosswalk, Lehman said. An ambulance transported the victim to the Community Hospital of the Monterey Peninsula, where he was declared dead.

"It's an unfortunate collision," Lehman said. "She was extremely distraught about it. It's going to be hard for her. This is a lot for a young driver to have to deal with and process." Investigators do not believe texting or drinking was factors in the crash, and the girl could not see the pedestrian before her SUV hit him.

2  
con't.





2  
con't.



## Response to Letter 14-5-e, Bud Get

1. This comment is about existing off-site traffic and circulation safety. Baseline conditions with respect to traffic and circulation are discussed in Subsection 11.1, Environmental Setting, in Section 11.0, Transportation and Parking, of the RDEIR. This comment does not raise an issue about the proposed project or raise an environmental issue. Therefore, no response is necessary. Please also see responses to Letter 14-1-m, and Letter 14-1-k, comment 1.
2. This comment appears to be from a 2012 news article about a Carmel High School student driving to school and hit a man attempting to cross State Route 1, a heavily traveled highway, and he was not in a marked crosswalk. This comment does not raise an issue about the proposed project or raise an environmental issue. Therefore, no response is necessary. Concerning existing perceived safety issues in general, please also refer to response to Letter 14-1-k, comment 1.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 8:39 PM  
Subject: RDEIR Feedback: Traffic Congestion on Highway 1  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

**PROBLEM:**

Traffic on Highway 1. It has been known for years that existing peak hour traffic exceeds the capacity of Highway 1 between Carmel Valley Road and Carpenter Street, a condition called level of service F (LOS F). The RDEIR has not accurately captured the vehicle trips each day to this segment of Highway 1.

It is unacceptable price for our residents and businesses to pay for access to their property and work. The designation was intended for urban streets and to assist in the design of roadway “architecture” such as medians, turn lanes, etc., rather than to evaluate traffic levels. It does not use vehicle counts to “measure” traffic intensity and results in an erroneous level of service C (LOS C). When actual vehicles are counted and conventional standards are applied, the current level of service F (LOS F) designation for Highway 1 is greatly exceeded. The RDIER would result in the “externalizing of costs” to the community and appear in the form of wasted time spent in traffic and its side effects as well as costly unintended consequences in an already congested area.

**MITIGATION MEASURES:**

- Accurately assess the VMT with updated relevant information vs. referencing past sources.
- Include all activities not just the limited football games you've highlighted for TMP but ALL the 400 practices and 124 games AND the other athletic activities including baseball.

## Response to Letter 14-5-f, Bud Get

1. This comment is about the level of service on State Route 1 and the Vehicle Miles Traveled (VMT) associated with the proposed project. The VMT analysis in the RDEIR, which include a detailed discussion of the methodology used in the evaluation, is included in Section 11.0, Transportation and Parking.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Wed, Oct 5, 2022 at 8:38 PM

Subject: RDEIR Feedback: Stadium Improvements - Include Baseball Fields and Students (Photo of Entrance to Baseball Field and Encroachment Problems)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1



This RDEIR has significantly increased its scope of work from the draft EIR. This in itself should immediately halt the project and trigger a restart back to Scoping Session and Notice of Preparation. We'd like to understand if this is legal what you are doing? You've added entire new projects and NOT addressing the comments from the DEIR.

Given you changed the title to "stadium improvements" and have included the pool, we'd like to have the baseball fields and students part of this discussion. For too long, CUSD has not done proper planning of long-term growth at the high school campus. This RDEIR is another example of a bunch of initiatives stuck together with no vision or planning through the thoughtful process of the Facilities Master Plan.

**Request:**

- Transparency and inclusion of the baseball team in the athletic stadium assessment: Schedules, number of students
- Inclusion and option of using the baseball field as an alternative to parking lots versus the Tennis courts (transparency of what is wrong with current tennis courts and cost to fix).
- Inclusion of baseball students in the VMT/Energy/GHG analysis and comparative to the other groups; football, tennis, softball, soccer
- Options and evaluation to fix, update and connect the baseball field to the back-side of the stadium
- Why can't the stairs be fixed as usable stairs to the stadium at the upper level? Why can't the baseball fields be parking lot vs. tennis courts?

**Can you confirm this entrance is approved by Emergency Access?**

**Please include the outcomes of a boundary survey you did in this area? Is that part of the project? We see no mention?**

## Response to Letter 14-5-g, Bud Get

1. The comment is repetitive of general comments previously stated by the commenter. Regarding the NOP, see response to Letter 14-2-c, comment 2, and 14-4-a, comment 1. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. Regarding improvements to the baseball field and facilities, improvements to the baseball field and facilities are not included in the project description. Please refer to response to Letter 14-1-g, comment 4. Regarding use of the baseball field as a parking lot, please refer to response to Letter 14-1-g, comment 4 and 14-2-o, comment 2. Figure 4-1, Overall Site Plan, and Figure 4-6, Post Development Overall Parking Exhibit, shows how the two new parking lots would connect to the stadium. Emergency access throughout the campus is provided by existing and proposed access routes. There are no special access routes in case of an emergency. See also response to Letter 14-2-f.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Wed, Oct 5, 2022 at 8:39 PM  
Subject: RDEIR Feedback: Resource Requested to Validate AERMET  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

Gregory Darvin / Atmospheric Dynamics, Inc.

Email of requestor: (Responses will be provided to this email address) \*

[https://docs.google.com/forms/d/1CWRug8NQ414PpjFTL\\_h5eTbR6G\\_S0afoQu0qUPBi7MY/edit#response=ACYDBNgTaMz8WbHbXJo6mBMxLLPtUYzy54QIq...](https://docs.google.com/forms/d/1CWRug8NQ414PpjFTL_h5eTbR6G_S0afoQu0qUPBi7MY/edit#response=ACYDBNgTaMz8WbHbXJo6mBMxLLPtUYzy54QIq...) 1/2

9/12/22, 2:16 PM

Submit a California Public Records Act Request to Carmel USD

Mailing address of requestor:

Your request: (To enable staff to respond to your request as efficiently as possible, please include: The date range for the records requested; the department that holds the records (if known); and the types of records, including any important keywords. Please do not include any confidential information.) \*

This data request is for the 2022 RDEIR for the Carmel High School Stadium Improvements project. We would like to obtain the following digital files that were used to produce the air quality and public health impact analyses, as prepared by Illingworth and Rodkin (2022). Those files should include the following:

- Five (5) year AERMET data set used in the analyses
- The AERMAP and AERMOD input/output files
- The working Excel spreadsheets used to calculate the health risk impacts for both cancer, chronic and acute
- The CalEEMod input/output for both construction and operational emissions

By providing this data as soon as possible, we can then prepare comments on the RDEIR.

We can also provide a shared drive location for the modeling and emissions data if needed. Please let us know.

Your CPRA Response indicates that you don't actually this resource available so the sections that use this input as fact are not valid. Please find new validation resources.

## Response to Letter 14-5-h, Bud Get

1. This comment includes a copy of a CPRA request submitted to the district. CPRA requests are not the subject of the RDEIR. The information requested in the CPRA request was provided by the school district to the requester. As a courtesy, please be advised that records responsive to this CPRA request are available to the public on the district's CPRA website, and may be found at the following link: <https://www.carmelunified.org/Page/6026>



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 6:29 AM

Subject: RDEIR Feedback: Carmel-by-the Sea (Sphere of Influence)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 **On Page 319: RDEIR highlights that the City of Carmel-by-the-Sea would be part of the impacted geographic scope for this project.**

**Questions:**

- What part of their General Plan would you be in violation of?
- Given the light pollution would spill to their jurisdiction, what are the next steps in addressing the significant and unavoidable impacts to their geography?
- Given the significant increase in traffic congestion, what are the next steps in addressing the significant and unavoidable impacts to their geography?
- Given the regulated trees create a welcoming environment to the top of their city, what are the next steps in addressing the significant and unavailable impacts to their geography?

- 2
- Page 379: You referenced consulting Swanson, Brandon, Community Planning & Building Director, City of Carmel-by-the-Sea, 7 June 2021; 29 July 2022. Can you provide us with the specific details of the discussion?
  - Page 390: You referenced consulting Swanson, Brandon, Planning & Community Development Director, City of Carmel-by-the-Sea. Phone conversation with consultant, dated 7 June 2021. Can you provide us with the specific details of the discussion?

3 **We believe you would be violating at minimum the following areas from their General Plan. Please respond with more detail on each concern.**

- Aren't you violating the preservation of the unique community that prides itself on its village character?
- Isn't the Project's location in the City's Sphere of Influence as identified in the Land Use Element of the General Plan?
- Isn't the proposed project inconsistent with Policy P1-127 of the Land Use Element of the General Plan that encourages areas in the Sphere of Influence to continue the existing pattern of low density development?
- Isn't the proposed project inconsistent with Objective O1-23 of the Land Use Element of the General Plan that encourages the City to support efforts to reduce congestion on Highway 1?
- Isn't the proposed scale and density of the project inconsistent with the character of the surrounding neighborhood?
- Won't the project create negative traffic and circulation impacts on the resident in the area?
- Won't the project degrade streets maintained by the City of Carmel by the Sea? Entry point of CBTS to the school entrance is a few blocks away. Traffic re-routing and back-up will be endless
- Won't the project risk the removal of significant Monterey Pine and Coast Live Oak Trees that should be preserved?

vicinity of the high school (see Table 15-2 below).

**Table 15-1 Cumulative Impact Analysis Geographic Scope**

Resource Area	Geographic Area
Aesthetics	State Route 1 corridor, between State Route 68 and Carmel Valley Road including portions of Hatton Canyon, the City of Carmel-by-the-Sea, and western most portions of Carmel Valley
Air Quality	Air Quality: North Central Coast Air Basin
Biological Resources	Unincorporated Monterey County (greater Carmel and Carmel Valley)
Cultural, Paleontological, and Tribal Resources	Historic and Archaeological Resources: City of Carmel-by-the-Sea, the State Route 1 corridor between State Route 68 and Carmel Valley Road, and surrounding unincorporated areas Paleontological Resources: Monterey County
Energy	State of California
Greenhouse Gas Emission	State of California
Noise	Projects that add traffic to State Route 1 and/or surrounding roads (traffic noise) Projects in the immediate vicinity with operational noise affecting the sensitive receptor nearest to Carmel High School (operational noise)
Transportation	Unincorporated Monterey County (greater Carmel and Carmel Valley)
Soils, Erosion, and Water Quality	State Route 1 corridor, between State Route 68 and Carmel Valley Road including portions of Hatton Canyon, the City of Carmel-by-the-Sea, and western most portions of Carmel Valley
Recreation	Carmel High School, Carmel Middle School, and public tennis courts within a five-mile radius

SOURCE: EMC Planning Group 2022

## Response to Letter 14-5-i, Bud Get

1. Regarding the City of Carmel-by-the-Sea general plan, the proposed project is not located within the boundaries of the City of Carmel-by-the-Sea, is not subject to the goals and policies in the general plan, and therefore, would not be in violation with the general plan. Please refer to Section 3.0, Environmental Setting, of the RDEIR, for a further discussion of the regulatory setting.

Regarding light pollution, see Section 5.0, Aesthetics, of the RDEIR.

Regarding transportation, see Section 11.0, Transportation and Parking, of the RDEIR.

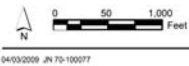
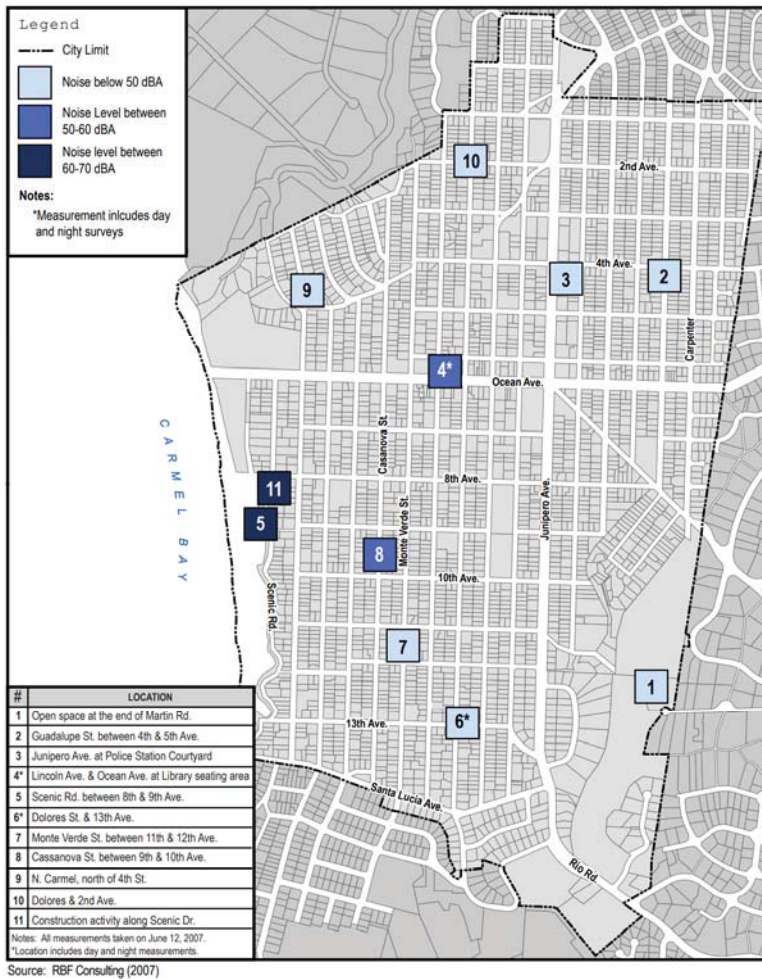
2. Regarding the consulting email with Brandon Swanson with the City of Carmel-by-the-Sea. The communications were about gathering information regarding cumulative projects in the vicinity. The communication (June 7, 2021) was during preparation of the original draft EIR. Mr. Swanson identified one hotel project that was under consideration (see page 15-3 of the RDEIR). The second communication (June 29, 2022) was sent during preparation of the RDEIR. Mr. Swanson did not follow up with any additional cumulative projects to consider in the RDEIR.
3. Regarding the City of Carmel-by-the-Sea general plan, the proposed project is not subject to the goals and policies in the general plan, and therefore, would not be in violation with the general plan. Please refer to response to comment 1, above.
4. This comment is a picture of Table 15-1, Cumulative Impact Analysis Geographic Scope. It does not contain a comment about the proposed project or raise an environmental issue; therefore, no response is necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
 Date: Thu, Oct 6, 2022 at 6:36 AM  
 Subject: RDEIR Feedback: Carmel-by-The-Sea (Noise Ordinance)  
 To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

Why aren't you referencing CBTS's noise ordinances ?  
 Can you provide detail on how you are not violating their required Noise Measurements?

<https://ci.carmel.ca.us/sites/main/files/file-attachments/introduction.pdf?1510257759>



CARMEL-BY-THE-SEA GENERAL PLAN UPDATE  
**Noise Measurement Locations**  
 Figure 9.2

## Response to Letter 14-5-j, Bud Get

1. The project site (high school campus) is not located in the City of Carmel-by-the-Sea; it is located in unincorporated Monterey County. Therefore, the noise analysis uses the County's noise policies and regulations in order to determine if the proposed project would have a significant noise impact. Please also see response to Letter 14-5-i, comment 1.

Additionally, see response to Letter 2b, comment 4, and Letter 11b, comment 16.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 6:45 AM

Subject: RDEIR: Projects in Cumulative Impact -Regional Housing Number Allocations

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

The state is mandating that Monterey County plan for 20,300 more homes -- or face consequences. Monterey County's RHNA target number for 2023-2031 is 20,295, almost three times the number required in the last eight-year cycle, which ran from 2014-2023. That total number is then divided between the 12 cities and the unincorporated county jurisdiction. For the entire region encompassing Monterey, Santa Cruz and San Benito counties, the number is 33,274 units.

Can you speak to more specific on how this flux of people and housing will impact traffic congestion?

Wouldn't the land use at Carmel Middle School be more appropriate for long-term growth?

When is the next time the Facilities Master Plan will be updated?



## Response to letter 14-5-k, Bud Get

1. This comment is about the unincorporated County of Monterey's plan to growth by 20,295 housing units over the next eight years, as required by the California Department of Housing and Community Development (HCD), and including this growth as a cumulative project in the RDEIR. The RDEIR addresses cumulative development in Section 10.0, Cumulative Impacts, and includes the methodology, as required by CEQA, for determining the cumulative geographic boundary for each impact area discussion. Including 20,295 housing units throughout the unincorporated County as a cumulative project is not required. Therefore, no changes to the RDEIR are necessary.

Unknown or speculative future updates to the district's 2019 Facilities Master Plan are not the subject of the RDEIR, and no further response is needed.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Thu, Oct 6, 2022 at 6:55 AM  
Subject: RDEIR: Monterey County General Plan To:  
CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 The General Plan contains seven (7) state-mandated elements. Can you provide an overview of each area and how the proposed project might be at risk in violating zoning /ordinances in each one? You don't connect the General Plan with specific elements of risk:

1. Land Use
2. Open Space
3. Conservation
4. Housing
5. Circulation
6. Noise
7. Safety

Your link on page 318 doesn't work:

<https://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency-rma-/planning/resources-documents/2010-general-plan%E3%A7%E3%A7%E3%A7>

## Response to Letter 14-5-I, Bud Get

1. Regarding the Monterey County general plan, see response to Letter 2b, comment 4, and Letter 11b, comment 16. In general, the RDEIR discusses noise, safety, land use, circulation, open space, and conservation elements of the General Plan in the Environmental Setting Section (3.0, p. 3-1, et seq.) and related Subsections of the RDEIR under each environmental factor (i.e., 7.2, 10.2, 11.2, etc.)

Regarding the link on page 318. There is no page 318 in the RDEIR; however, the commenter is likely referring to page 318 of the PDF. There is no such link on page 318 of the PDF. However, it appears the commenter is trying to access Monterey County's general plan. As of October 26, 2022, it can be accessed at

<https://www.co.monterey.ca.us/government/departments-a-h/housing-community-development/planning-services/advance-planning/land-use-regulations/2010-general-plan>

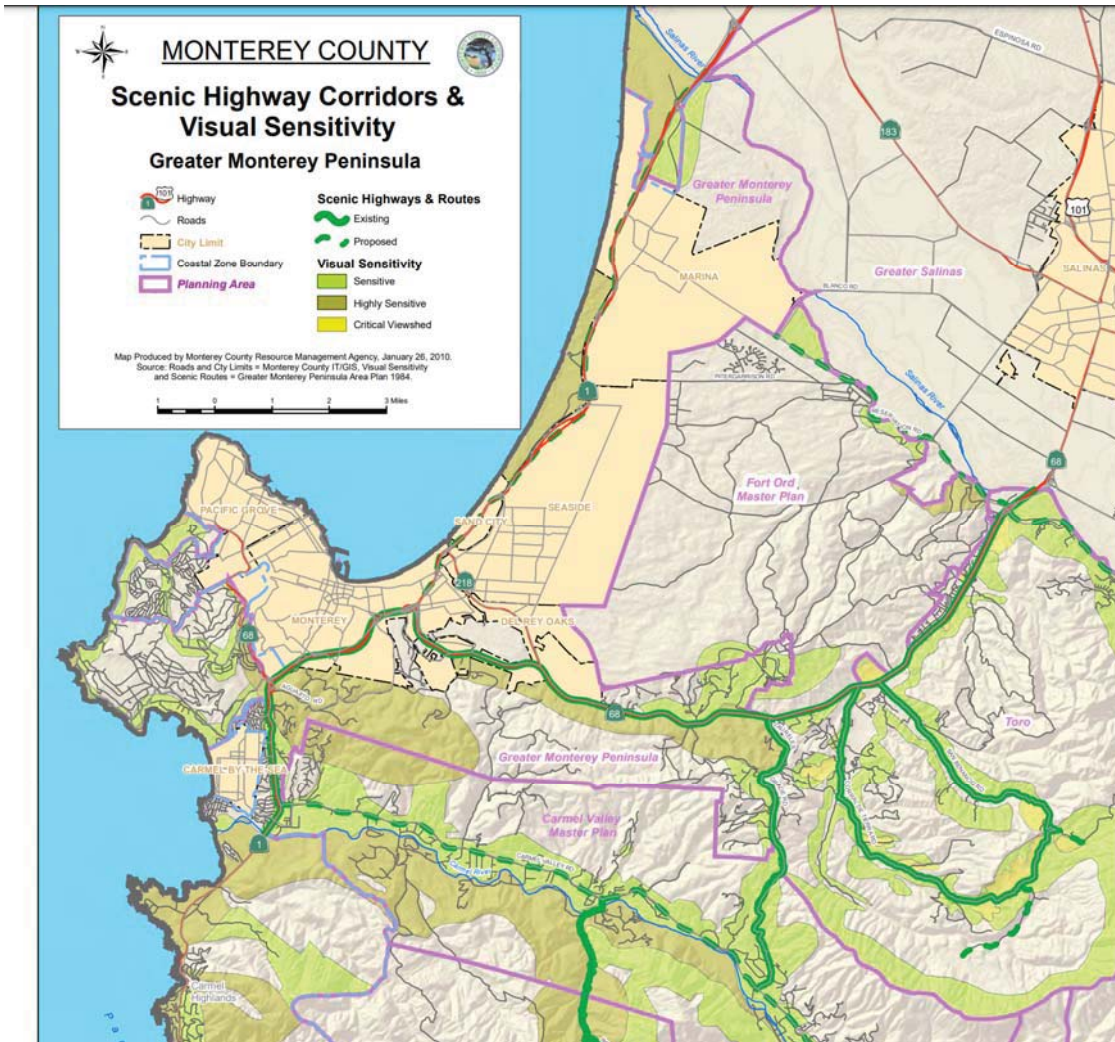
From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 8:53 AM

Subject: RDEIR Feedback: Monterey County Visual Sensitivity (Implications to Project Site and Alternative Location CMS)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1



While the project site is in Monterey County (Monterey County Master Plan), can you confirm if the alternative location Carmel Middle School is in the Carmel Valley Master Plan?

Your inclusion of the Monterey County Scenic Highway Corridors & Visual Sensitivity Map would be critical:

<https://www.co.monterey.ca.us/home/showpublisheddocument/45898/636389941569630000>

Can you drill down to the site location exactly and visually show the referenced color indexes within a 5 mile radius of the project site?

## Response to Letter 14-5-m, Bud Get

1. The commenter provides the Monterey County Scenic Highway Corridors & Visual Sensitivity Map for the Greater Monterey Peninsula, which is referenced throughout the RDEIR (see pages 5-12, 5-20, 18-24, 20-4, 20-10 & 20-11). The map also shows the Monterey County Scenic Highway Corridors & Visual Sensitivity Map for the Carmel Valley Master Plan. Both the high school and the middle school are located in areas identified as visually “sensitive.”

Regarding the request to “drill down to the site location exactly and visually show the referenced color indexes within a 5-mile radius of the project site,” is not necessary to show color indexes within a 5-mile radius of the project site to evaluate the visual impact of the project or the alternative project at the middle school. No changes to the RDEIR are required.

----- Forwarded message -----

Letter #14-5-n

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 7:18 PM

Subject: RDEIR Feedback: Project Site Photographs (Erosion / Grading)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

- Why are your Project Site Photographs limited?
- Why are your Project Site Photographs not broader to show the whole athletic snapshot?

If your goal with the RDEIR is to expand to "stadium improvements", we'd like to provide more in-depth and accurate photos of the project site.

Below shows the backside of the stadium field / tennis courts/ baseball field - all interconnected.

2

**Questions:**

- The Facilities Master Plan indicates there may be an "erosion" issue on Carmel High School Campus. Can you provide specific details on where and the conditions?
- How does the new parking lot (location - ripping out the tennis courts) fit into this grading issue? How will you resolve it and what is your mitigation measure?
- Does the below have potential to become a long-term sink-hole? How will you prevent risk in order for investments, students and visitors to be safe?





## Response to Letter 14-5-n, Bud Get

1. This comment is about the photos in the RDEIR, but does not state why the commenter believes the photos are limited. The RDEIR includes both aerial photographs of the entire campus, as well as on ground close ups of various areas where changes are proposed. Nearly all of the figures (graphics) in the RDEIR include photographs, in sufficient detail to explain the existing environmental setting, the proposed project, and to identify and evaluate the environmental impacts associated with the proposed project. Please refer to the list of Figures in the RDEIR's Table of Contents. No changes to the RDEIR are needed.
2. The 2019 Facilities Master Plan is not the subject of the RDEIR; however, some of the components of the master plan are included in the proposed project. Erosion associated with grading activities can occur when soils are disturbed. Very little grading is associated with the proposed project because all improvements are located on previously developed and/or disturbed areas of the campus. Erosion associated with the proposed project is addressed in Section 12.0, Soils, Erosion, and Water Quality.

The comment about an alleged potential long-term sink hole is not associated with the proposed project and no construction work is proposed for the location shown in the photograph, which is looking out over the baseball field parking lot from the edge of the slope to the immediate north of the baseball field. Therefore, no response is required.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 7:22 PM

Subject: RDEIR Feedback: Project Site Photos (Backside of Stadium)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

Why are your Project Site Photographs limited?

Why are your Project Site Photographs not broader to show the whole athletic snapshot?

If your goal with the RDEIR is to expand to "stadium improvements", we'd like to provide more in-depth and accurate photos of the project site.

Below shows the backside of the stadium field and baseball field - both inter-connected

**Questions:**

- What is the plan for this area that intersects with the stadium and the top of the baseball stadium?
- Why is this not part of the RDEIR? This looks like it needs improvement and should be made safer.
- What is the big vision to incorporate this into a broader athletic plan?



## Response to Letter 14-5-o, Bud Get

1. This comment is regarding questions and photographs about the baseball field and facilities, including a staircase, but does not state why the commenter believes the photos are limited. Changes to the baseball field and its facilities are not included in the proposed project, and the comment does not raise environmental issues about the proposed project. Therefore, no response is necessary. Please also refer to responses to Letter 14-1-g, comment 4, and 14-4-n, comment 1.

Regarding photographs, the RDEIR includes both aerial photographs of the entire campus, as well as on ground close ups of various areas where changes are proposed. Nearly all of the figures (graphics) in the RDEIR include photographs, in sufficient detail to explain the existing environmental setting, the proposed project, and to identify and evaluate the environmental impacts associated with the proposed project. Please refer to the list of Figures in the RDEIR's Table of Contents. No changes to the RDEIR are needed.



----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 7:25 PM

Subject: RDEIR Feedback: Project Site Photographs (Backside of Stadium connected to Baseball Field)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

Why are your Project Site Photographs limited?

Why are your Project Site Photographs not broader to show the whole athletic snapshot?

If your goal with the RDEIR is to expand to "stadium improvements", we'd like to provide more in-depth and accurate photos of the project site.

Below shows the backside of the stadium field and baseball field - both inter-connected

**Questions:**

- What is the plan for this area that intersects with the stadium and the top of the baseball stadium?
- Why is this not part of the RDEIR? This looks like it needs improvement and should be made safer.
- What is the big vision to incorporate this into a broader athletic plan?
- Is this one of the "regulated trees" referenced in the RDEIR? Can you provide a visual map / marking to include this area?



## Response to Letter 14-5-p, Bud Get

1. This comment is regarding questions about photographs, the baseball field, and a tree, but does not state why the commenter believes the photos in the RDEIR are limited. Changes to the baseball field and its stairs are not included in the proposed project, and the comment does not raise environmental issues about the proposed project. Therefore, no response is necessary. Please also refer to responses to Letter 14-1-g, comment 4, and 14-4-n, comment 1.

Regarding photographs, the RDEIR includes both aerial photographs of the entire campus, as well as on ground close ups of various areas where changes are proposed. Nearly all of the figures (graphics) in the RDEIR include photographs, in sufficient detail to explain the existing environmental setting, the proposed project, and to identify and evaluate the environmental impacts associated with the proposed project. Please refer to the list of Figures in the RDEIR's Table of Contents. No changes to the RDEIR are needed.

The photo of the tree attached to this email appears to be one of the Monterey pine trees (*Pinus radiata*) identified in Figure 7-1, Habitat Map and discussed on page 7-18 of the RDEIR.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 7:30 PM

Subject: RDEIR Feedback: Baseball Field / Parking and Stadium Improvements (Project Site Photos)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

Why are your Project Site Photographs limited?

Why are your Project Site Photographs not broader to show the whole athletic snapshot?

If your goal with the RDEIR is to expand to "stadium improvements", we'd like to provide more in-depth and accurate photos of the project site.

Below shows the backside of the stadium field and baseball field - both inter-connected

**Questions:**

- In your parking space overview, why didn't you show additional options of how to better maximize parking spaces at the Baseball field?
- What is that area next to the bleachers? Can you add more parking spaces there?
- Is there an opportunity to assess the structures in this photo for removal and more parking spaces? We are not sure what is the purpose of these structures and their value?





## Response to Letter 14-5-q, Bud Get

1. This comment is regarding questions about photographs and the baseball field. The comment is repetitive of general comments previously stated by the commenter. Changes to the baseball field, baseball dugouts, batting cages, and other facilities identified in the comment are not included in the proposed project, and the comment does not raise environmental issues about the proposed project. Therefore, no response is necessary. Please refer to responses to Letter 14-5-n, comment 1, Letter 14-5-o, Letter, 14-5-p, Letter 14-1-g, comment 4, Letter 14-2-o, comment 2, and Letter 14-4-n, comment 1.

Regarding photographs, the RDEIR includes both aerial photographs of the entire campus, as well as on ground close ups of various areas where changes are proposed. Nearly all of the figures (graphics) in the RDEIR include photographs, in sufficient detail to explain the existing environmental setting, the proposed project, and to identify and evaluate the environmental impacts associated with the proposed project. Please refer to the list of Figures in the RDEIR's Table of Contents. No changes to the RDEIR are needed.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Letter #14-5-r

Date: Thu, Oct 6, 2022 at 7:34 PM

Subject: RDEIR Feedback: Project Site Photos (Structure at the bottom of Stadium Fields)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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Why are your Project Site Photographs limited?

Why are your Project Site Photographs not broader to show the whole athletic snapshot?

If your goal with the RDEIR is to expand to "stadium improvements", we'd like to provide more in-depth and accurate photos of the project site.

Below shows the backside of the stadium field and baseball field - both inter-connected

**Questions:**

- This structure is located right next to the Stadium. What is its purpose? Why isn't it part of the RDEIR?
- How might this structure be improved to meet any of the stated objectives?
- Is this structure safe? Are you removing it?



## Response to Letter 14-5-r, Bud Get

1. This comment is regarding questions about photographs and the baseball field. The comment is repetitive of general comments previously stated by the commenter. Changes to the baseball field are not included in the proposed project, and the comment does not raise environmental issues about the proposed project. Additionally, the commenter has provided a picture of a building that is not included in the proposed project. Therefore, no response is necessary. Please refer to responses to Letter 14-5-n, comment 1, Letter 14-5-o, Letter, 14-5-p, Letter 14-5-q, Letter 14-1-g, comment 4, Letter 14-2-o, comment 2, and Letter 14-4-n, comment 1.

Regarding photographs, the RDEIR includes both aerial photographs of the entire campus, as well as on ground close ups of various areas where changes are proposed. Nearly all of the figures (graphics) in the RDEIR include photographs, in sufficient detail to explain the existing environmental setting, the proposed project, and to identify and evaluate the environmental impacts associated with the proposed project. Please refer to the list of Figures in the RDEIR's Table of Contents. No changes to the RDEIR are needed.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 7:40 PM

Subject: RDEIR: Project Site Photos (Backside of Stadium)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>,

<[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 Why are your Project Site Photographs limited?

Why are your Project Site Photographs not broader to show the whole athletic snapshot?

If your goal with the RDEIR is to expand to "stadium improvements", we'd like to provide more in-depth and accurate photos of the project site.

Below shows the backside of the stadium field and baseball field - both inter-connected

2 **Questions:**

- This is the backside of the stadium. Is this safe?

- Why isn't this included in the RDEIR for improvements?

- Is there an erosion / grading issue in this area?

3 - What are the mitigation measures you are going to take in order to prevent what happened to Seaside Stadium:

<https://www.montereyherald.com/2022/08/18/monterey-peninsula-unified-school-district-looking-to-fix-sinking-seaside-high-field/>



## Response to Letter 14-5-s, Bud Get

1. This comment is regarding questions about photographs. The comment is repetitive of general comments previously stated by the commenter. Please refer to responses to Letter 14-5-n, comment 1, Letter 14-5-o, Letter, 14-5-p, Letter 14-5-q, Letter 14-5-r, Letter 14-1-g, comment 4, Letter 14-2-o, comment 2, and Letter 14-4-n, comment 1. The RDEIR includes both aerial photographs of the entire campus, as well as on ground close ups of various areas where changes are proposed. Nearly all of the figures (graphics) in the RDEIR include photographs, in sufficient detail to explain the existing environmental setting, the proposed project, and to identify and evaluate the environmental impacts associated with the proposed project. Please refer to the list of Figures in the RDEIR's Table of Contents. No changes to the RDEIR are needed.
2. These questions are about the backside of the stadium, and erosion and grading in this area. There are no proposed improvements on the backside of the stadium, therefore, erosion and grading in this area is not an impact of the project and not addressed in the RDEIR.
3. This question is about an article regarding Seaside High School stadium. The link provided in the comment was not working on October 27, 2022, and therefore, it's not clear what the comment is about. It should be noted that the Seaside High School stadium is located approximately 6.2 miles northeast of the Carmel High School campus and is not related to the proposed project. Other projects or alleged issues at other high school sites are not the subject of the RDEIR. Therefore, no further response is necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Thu, Oct 6, 2022 at 7:40 PM  
Subject: Re: RDEIR: Project Site Photos (Backside of Stadium)  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 A closer view of the original photo.



On Thu, Oct 6, 2022 at 7:39 PM Bud Get <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)> wrote:

Why are your Project Site Photographs limited?

Why are your Project Site Photographs not broader to show the whole athletic snapshot?

If your goal with the RDEIR is to expand to "stadium improvements", we'd like to provide more in-depth and accurate photos of the project site.

Below shows the backside of the stadium field and baseball field - both inter-connected

**Questions:**

- This is the backside of the stadium. Is this safe?

- Why isn't this included in the RDEIR for improvements?

- Is there an erosion / grading issue in this area?

- What are the mitigation measures you are going to take in order to prevent what happened to Seaside Stadium:

<https://www.montereyherald.com/2022/08/18/monterey-peninsula-unified-school-district-looking-to-fix-sinking-seaside-high-field/>



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cont.



## Response to Letter 14-5-t, Bud Get

1. The comment is repetitive of general comments previously stated by the commenter. See response to Letter 14-5-s.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 7:45 PM

Subject: Re: RDEIR: Project Site Photos (Backside of Stadium)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[rosen@carmelunified.org](mailto:rosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 Why are your Project Site Photographs limited?

Why are your Project Site Photographs not broader to show the whole athletic snapshot?

If your goal with the RDEIR is to expand to "stadium improvements", we'd like to provide more in-depth and accurate photos of the project site.

Below shows the backside of the stadium field and baseball field - both inter-connected

2 **Questions:**

- How will the new parking lot connect to the stadium? This photo shows existing stairs. Will they stay? How will they be connected to the proposed stadium?
- Will this section only be open during games for the stadium and/or daily for school use?
- How will you connect them for safety?
- What is the Emergency Access Plan for this section?
- Are there Fire Safety Codes you will be following?



## Response to Letter 14-5-u, Bud Get

1. The comment is repetitive of general comments previously stated by the commenter. This comment is about the photos in the RDEIR. Please refer to responses to Letter 14-5-n, comment 1, Letter 14-5-o, Letter, 14-5-p, Letter 14-5-q, Letter 14-5-r, Letter 14-1-g, comment 4, Letter 14-2-o, comment 2, and Letter 14-4-n, comment 1. The RDEIR includes both aerial photographs of the entire campus, as well as on ground close ups of various areas where changes are proposed. Nearly all of the figures (graphics) in the RDEIR include photographs, in sufficient detail to explain the existing environmental setting, the proposed project, and to identify and evaluate the environmental impacts associated with the proposed project. Please refer to the list of Figures in the RDEIR's Table of Contents. No changes to the RDEIR are needed.
2. This comment is about how the new parking lot will connect to the stadium. The proposed project includes two new parking lots (see Section 4.0, Project Description, of the RDEIR). Figure 4-1, Overall Site Plan, and Figure 4-6, Post Development Overall Parking Exhibit, of the RDEIR shows how the two new parking lots would connect to the stadium. Emergency access throughout the campus is provided by existing and proposed access routes. There are no special access routes in case of an emergency. See also response to Letter 14-2-f.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 7:51 PM

Subject: RDEIR Feedback: Project Site Photographs (Intersection of Proposed New Parking Lot and Baseball Gate Entrance)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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Why are your Project Site Photographs limited?

Why are your Project Site Photographs not broader to show the whole athletic snapshot?

If your goal with the RDEIR is to expand to "stadium improvements", we'd like to provide more in-depth and accurate photos of the project site.

Below shows the backside of the stadium field and baseball field - both inter-connected

**Questions:**

- How will the new proposed parking lot (replacing tennis courts) intersect with the gate access of baseball field? How do you prevent two cars at each section AND cars on Morse Drive AND cars turning from Highway 1 to be safe at this intersection?
- What is the red curb in this photo on the left side? Is that regulated for safety? What will replace it?
- How will this be part of an Emergency Access Route?
- What will the exact traffic circulation look like? How do you ensure this is safet?



## Response to Letter 14-5-v, Bud Get

1. This comment is regarding questions about the baseball field and the intersection of Morse Drive and State Route 1. The comment is repetitive of general comments previously stated by the commenter. Regarding photographs, see response to Letter 14-5-n. Changes to the baseball field are not included in the proposed project. Please refer to response to Letter 14-1-g, comment 4.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 7:56 PM

Subject: RDIER Feedback: Project Site Photos (Back Entrance intersecting with Proposed Parking Lot)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

- 1 | Why are your Project Site Photographs limited?  
Why are your Project Site Photographs not broader to show the whole athletic snapshot?

If your goal with the RDIER is to expand to "stadium improvements", we'd like to provide more in-depth and accurate photos of the project site.

Below shows the backside of the stadium field and baseball field - both inter-connected

**Questions:**

- 2 | - In Figure 4-1, it is unclear and without detail on how you will manage traffic circulation with the intersection of the current back entrance (with orange danger signs) and the proposed 18' Drive Aisle?  
- Will there be stop signs?  
- How do you manage traffic circulation from Highway 1?  
- How do you manage traffic congestion from Highway 1? (currently existing)

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## Response to Letter 14-5-w, Bud Get

1. This comment is about the photos in the RDEIR and the commenter's opinion that the photos are "limited", but doesn't state how or why. The comment is repetitive of general comments previously stated by the commenter. The RDEIR includes both aerial photographs of the entire campus, as well as on ground close ups of various areas where changes are proposed. Nearly all of the figures (graphics) in the RDEIR include photographs, in sufficient detail to explain the existing environmental setting, the proposed project, and to identify and evaluate the environmental impacts associated with the proposed project. Please refer to the list of Figures in the RDEIR's Table of Contents. No changes to the RDEIR are needed.
2. The draft Traffic Management Plan is included in Appendix K of the RDEIR, discussed in Section 11.0, Transportation and Parking, in the RDEIR, and required as a mitigation measure as Mitigation Measure 11-4.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 8:01 PM

Subject: Re: RDIER Feedback: Project Site Photos (Back Entrance intersecting with Proposed Parking Lot) To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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In continuing this thread, please confirm this building will be gone? Can you provide more information? It appears you have a stop sign? Can you provide more detail? Isn't there a significant blind-spot? Shouldn't you conduct a Vehicular Study to ensure this is safe and effective? Can you clarify the black lines on Figure 4-1?





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## Response to Letter 14-5-x, Bud Get

1. Regarding removal of the building in the photos provided, removal and demolition activities will include demolition of the existing single story 1,000 square foot, wood frame storage as identified in Figure 4-9, Demolition Plan Tennis Courts.

Regarding the black lines on Figure 4-1, it's not clear to what the commenter is referring. At the location of the building to be demolished is an *existing gated driveway for ingress only*; no exiting is currently allowed at this location, or is proposed to be allowed with implementation of the proposed project. This is also the location where the existing campus main parking lot would connect to the 18-foot-wide drive aisle to the proposed new parking lot replacing the tennis courts. Please refer to Figures 4-1, 4-6, 4-9, 4-10 of the RDEIR and relevant discussion therein. Proposed on-site circulation design features, including circulation within parking lots, are analyzed in the RDEIR in Subsection 11.4 of Section 11, Transportation and Parking. The proposed additional driveway, internal roadway, and parking areas have been designed for both smooth vehicular and pedestrian circulation and safety. No changes to the RDEIR are needed.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 8:23 PM

Subject: RDEIR Feedback Project Site Photos (Structure and Stair Case Connecting Baseball Field and Stadium)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 Why are your Project Site Photographs limited?

Why are your Project Site Photographs not broader to show the whole athletic snapshot?

If your goal with the RDEIR is to expand to "stadium improvements", we'd like to provide more in-depth and accurate photos of the project site.

Below shows the backside of the stadium field and baseball field - both inter-connected

**Questions:**

- There are permanent chainlinks fences, "danger" cones and orange nettings on the backside of the Stadium. Can you provide more details on how this areas is cleaned up for safety in the RDEIR?
- Is this safe currently?
- What measure are you taking for it to be safe at night?



## Response to Letter 14-5-y, Bud Get

1. This comment is regarding questions about photographs and the baseball field and sets forth the commenter's opinion that the photos are "limited", but doesn't state how or why. The comment is repetitive of general comments previously stated by the commenter, and the comment does not raise environmental issues about the proposed project. Please see responses to Letter 14-5-w, comment 1, Letter 14-5-r, comment 1, and Letter 14-5-s, comment 2. Therefore, no response is necessary.

In general, improved safety is the focus of two objectives of the proposed project, Objective No. 4 and Objective No. 6, discussed on page 4-1 of the RDEIR. Proposed lighting at the existing stadium, new tennis court parking lot, and pedestrian path, as well as traffic circulation and parking improvements, ADA improvements, pedestrian pathway improvements are components of the proposed project that would improve safety conditions at Carmel High School at night.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 8:08 PM

Subject: RDEIR Feedback: Accurate Project Site Photos ( Walkway connecting Tennis Courts and Baseball Field)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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In your Project Site Photo you provide #3: Existing tennis courts looking east towards the baseball field. Your photos must be outdated? These recent photos don't show the tree in your photo? What year were all your project site photos taken?  
How do these chain link fences stay connected to the proposed parking lots"  
Why don't you provide enough detail for decision makers?





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③ Existing tennis courts looking east towards baseball field

## Response to Letter 14-5-z, Bud Get

1. Regarding “Project Site Photo #3,” we believe the commenter is referring to Figure 3-4, Project Site Photographs - Existing Tennis Court and Pedestrian Path Site, picture #3, “Existing tennis courts looking east towards baseball field.” The photo in question was taken on June 15, 2022 by senior biologist Patrick Furtado. The photo submitted by the commenter appears to have been taken at a different location along that dirt path.

It is unclear what the commenter means by “How do these chain link fences stay connected to the proposed parking lots”. As depicted on Figure 4-9 and discussed on page 4-21, the existing tennis court fencing would be removed as part of the tennis court demolition prior to the construction of the proposed tennis court parking lot in this location.

No changes to the RDEIR are needed.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

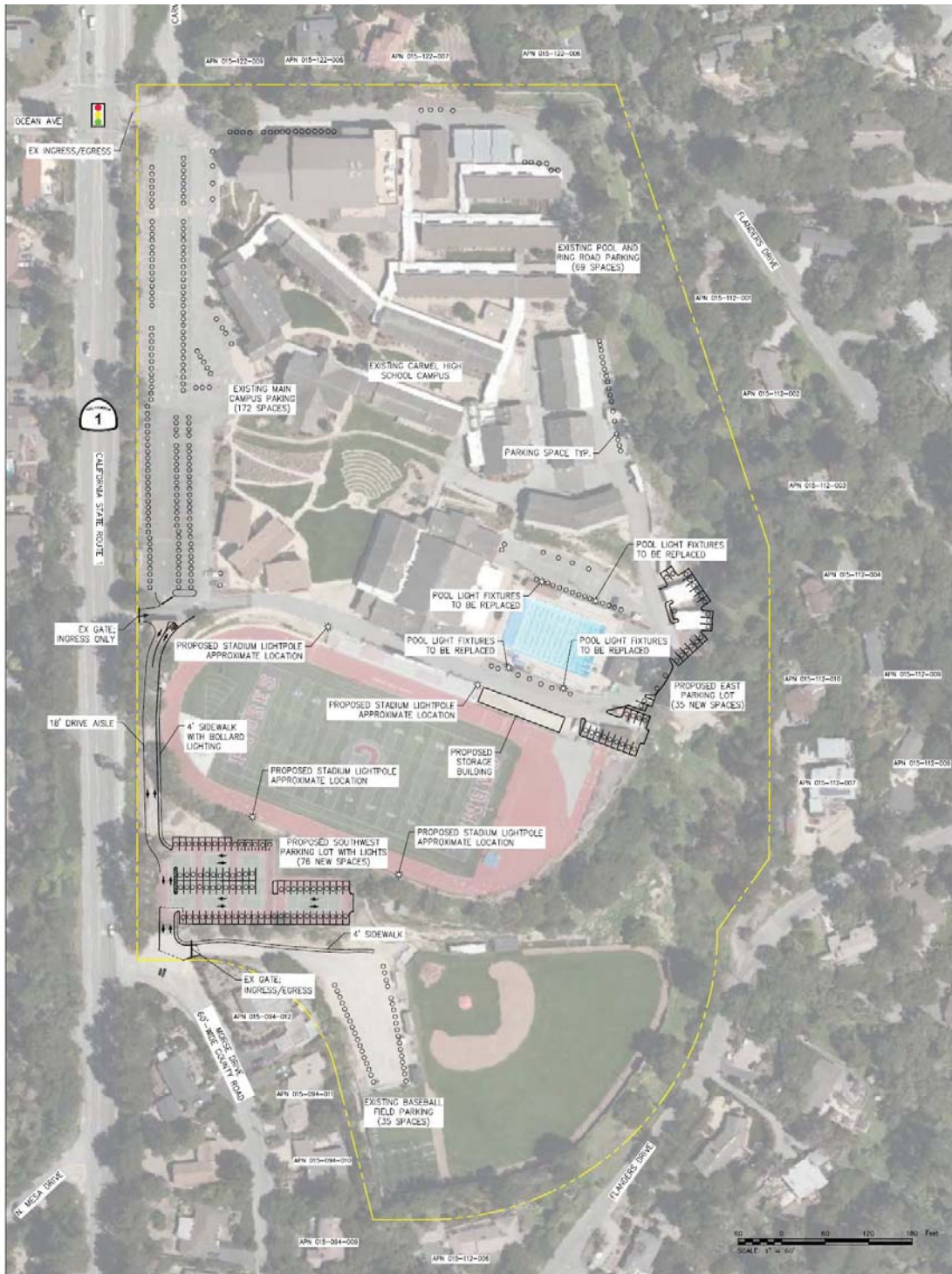
Date: Fri, Oct 7, 2022 at 3:11 PM

Subject: RDEIR Feedback: Fire and Safety of 35 New Proposed Parking Spaces

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

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Source:Whitson Engineers 2022

Figure 4-1  
Overall Site Plan



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con't.

This overall Site Plan shows where the new parking structures are but it doesn't overlay a clear circulation traffic plan. For the Proposed East Parking Lot (35 Spaces), can you provide measurements and specs to understand distances? Is this safe? Will it have an approved Emergency Access Plan?  
Why don't you have project site photos of this area?  
Isn't that oneway lane/roadway between stadium and pool dangerous to have cars driving so they can access the parking lot behind the school? Isn't that a Fire lane? What would be the Firelane markings?  
How would students from the Proposed Parking lot (35 spaces) safely cross the school grounds to get to classes?

## Response to Letter 14-6-a, Bud Get

1. This comment is regarding the proposed new parking area east of the existing pool facility. The following information, included in the RDEIR, is provided for clarification.

Existing photos of this area are included on Figure 3-5, Project Site Photographs – Perimeter Area near Existing Pool Site. The existing conditions are textually described on page 3-17. This is a parking lot (or area); it is not a parking structure. The proposed parking area is presented in Figure 4-1, Overall Site Plan, Figure 4-6, Post Development Overall Parking Exhibit, Figure 4-7, Demolition Plan East Parking Lot, and Figure 4-8, East Parking Lot – Conceptual Design.

Regarding the access road to the new parking lot east of the pool facility, access to this parking lot will be restricted. During the school day the parking lot will be used by staff and as overflow for visitors for events such as Padre Parents meetings. During events with high attendance, the lot will be used by staff and athletes. The text in the RDEIR on page 4-6 has been modified regarding the use of the parking lot.

This additional parking area will be accessed via Ocean Avenue and the campus ring road.” The existing ring road, as well as all ingress, egress, and internal circulation, serve as emergency access at the campus. The “one-way lane/roadway between the stadium and pool” is an existing ring road through the campus and is not dangerous. Existing circulation is depicted on Figure 3-6 of the RDEIR. Regarding circulation, please also see responses to Letter 14-2-f and 14-3-e.

Regarding pedestrian access across campus from the proposed new parking area east of the existing pool facility, existing pedestrian pathways already serve the existing pool facility parking lot discussed on page 3-22 and depicted on Figure 3-6 of the RDEIR. These same existing pedestrian pathways would serve the proposed additional new parking lot. In addition, the proposed project includes a 4-foot-wide pedestrian path adjacent to the internal connector roadway and tennis court parking lot. Please refer to pages 2-1, 3-16, 4-2, 4-21, 11-21, and references elsewhere in the RDEIR for further discussion.

This comment does not raise an environmental issue and therefore, no further response is required.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Letter #14-6-b

Date: Fri, Oct 7, 2022 at 6:57 PM

Subject: RDEIR Feedback: Project Site Photos (Intersection of Highway 1 and proposed Roadway)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>,

<[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

Why are your Project Site photos limited?

Why are you providing limited view of parking, traffic circulation, emergency access routes, fire lanes, pedestrian walk-ways, etc?

2

If your objective is to Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds, provide current benchmarking and proposed.

Below is the project site of where the proposed 18 foot Road would intersect with existing parking lot

**Questions:**

- How do you propose having this safe with the top of the proposed road is at the intersection with cueing for Scenic Highway 1 and your back-entrance? Can you provide another layer of detail so we can understand the safety aspect?
- Is this section in fire violation now? Why do you have those orange markings temporary markings? Will you have permanent markings? What will they be?
- How will you prevent further back-up on Scenic Highway 1 on school drop-off and pick-up days?
- Where will the current bus stop re-locate?
- What is in this shed?
- Will that red curb remaining? Is that a Fire Lane? How will emergency vehicle be able to pass?



## Response to Letter 14-6-b, Bud Get

1. Regarding project site photos, see response to Letter 14-5-w, comment 1.
2. Existing circulation is depicted on Figure 3-6 of the RDEIR. Please also see responses to Letter 14-2-f and 14-3-e. Regarding the proposed 18-foot road that would intersect with the existing parking lot: for clarification, this proposed road would connect the existing main parking lot with the proposed new parking lot where the tennis courts are located, as presented in Figure 4-1, Overall Site Plan and in Figure 4-6, Post Development Overall Parking Exhibit, and Figure 4-10, Tennis Court Parking Lot – Conceptual Design. The proposed new parking area and access road are textually described on page 4-21.

As discussed on page 11-12, the proposed project would not require the construction, re-design, or alteration of any public roadways outside the Carmel High School campus, including relocation of any current bus stop.

The commenter provides a picture of an existing building at the north end of the proposed new access road and an existing driveway. As described on page 4-21, this existing single story 1,000 square foot, wood frame storage building would be removed. The driveway provides only ingress (entering the campus). As stated in Section 11.0, Transportation and Parking, of the RDEIR, with implementation of Traffic Management Plan on-campus circulation would be adequate.

This comment does not raise an environmental issue; therefore, no further response is necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Letter #14-6-c

Date: Fri, Oct 7, 2022 at 7:21 PM

Subject: RDEIR Feedback: Project Site Photos with

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>,

<[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 Why are your Project Site photos limited?

Why are you providing a limited visual view and photos of parking, traffic circulation, emergency access routes, fire lanes, pedestrian walk-ways, etc?

2 If your objective is to Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds, provide current benchmarking and proposed.

Below is the project site of where the proposed 18 foot Road would intersect with existing parking lot

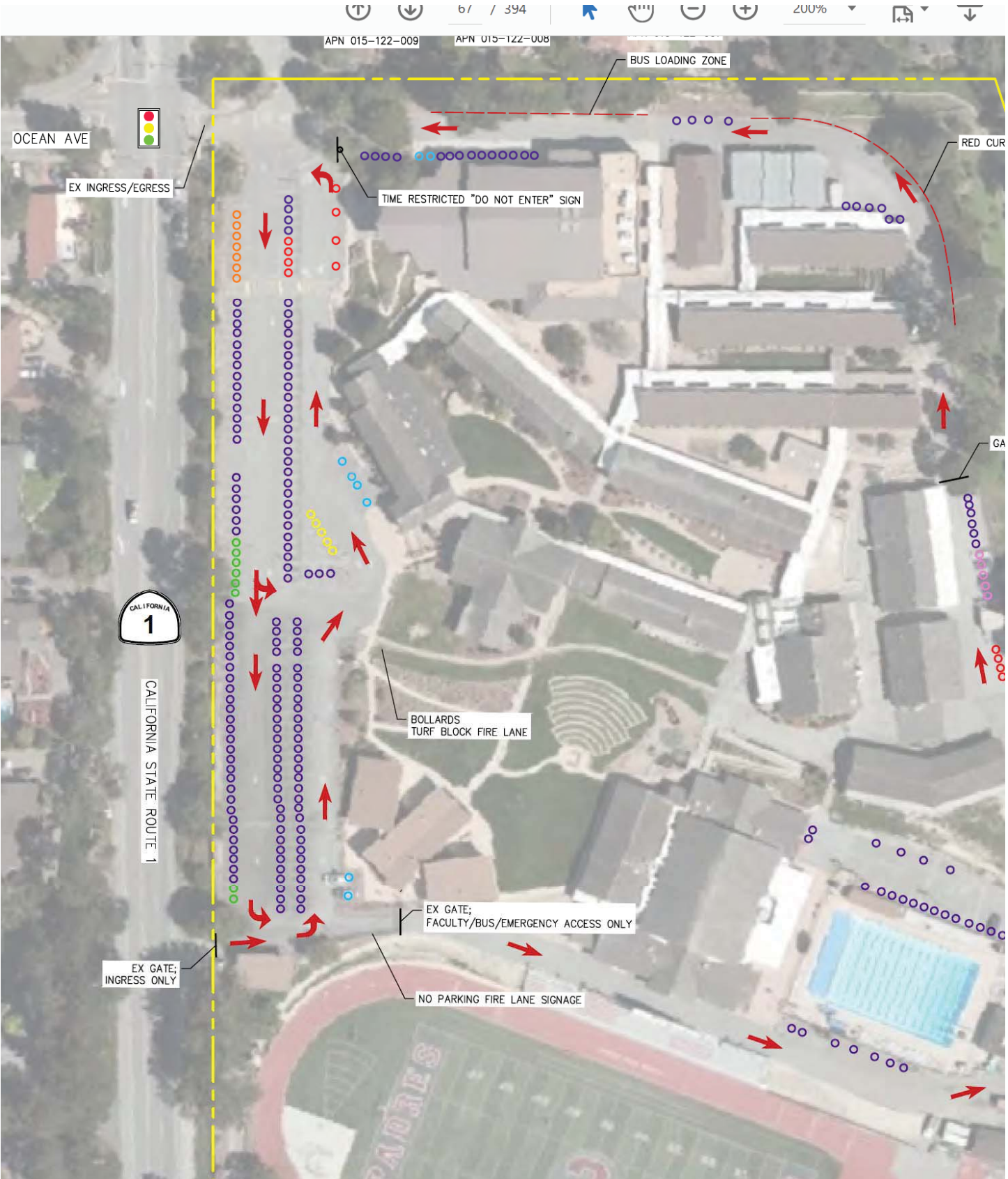
**Questions:**

- Is Figure 3-6 your intended final traffic circulation? It's unclear if it's current and/or proposed?
- Why do you have a red arrow indicating that traffic will be going through this gate to access the new parking lot? Is that accurate?
- We see a faculty/bus/emergency access only and yet are you proposing this is how students/faculty access the new 35 parking spaces in the new lot?
- How are students/faculty/visitors accessing the parking spaces surrounding the swimming pool? Don't they also drive through this Emergency Access? Does that violate Emergency Access Route?
- How often is this gate open and closed? What are the hours? How far back is the "No Parking" from this gate? There are cars and events constantly blocking this gate. Is that allowed?
- Will this be the main roadway for students/staff/visitors to access the new parking lot?
- Why don't you combine Figure 3-6 with Parking Spaces and Circulation with Figure 4-1 Overall Site Plan for clear visibility of how new proposed parking lots will look like with traffic circulation for safety?

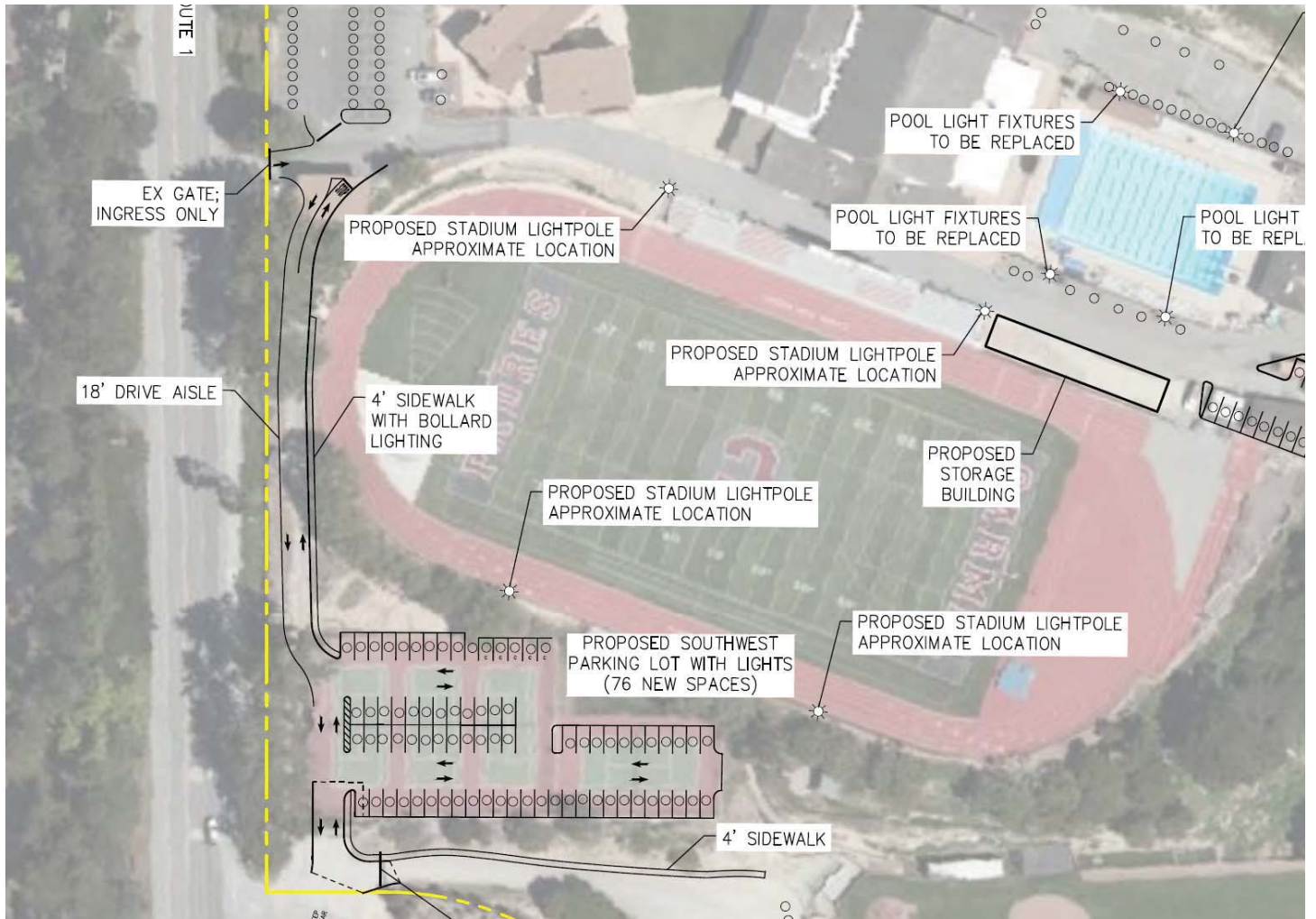




2  
cont.







## Response to Letter 14-6-c, Bud Get

1. Regarding project site photos, see response to Letter 14-5-w, comment 1.
2. The comment is repetitive of general comments previously stated by the commenter. Please refer to response to Letter 14-6-b, comment 2.

This comment is regarding Figure 3-6. For clarification and as presented in Section 3.0, Environmental Setting, this figure is named “Existing On-Campus Parking Spaces and Circulation,” and provides the existing on-campus parking spaces and circulation. The red arrows indicate the flow of traffic.

For further clarification and as presented in Section 4.0, Project Description, the proposed on-campus parking and circulation is presented in Figure 4-6, Post Development Overall Parking Exhibit. This figure includes all existing and proposed parking spaces, as well as post project circulation. The black arrows indicate the flow of traffic.

The remainder of this comment does not raise an environmental issue and therefore, no further response is required.

Date: Fri, Oct 7, 2022 at 7:31 PM

Subject:

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>,<[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 Why are your Project Site photos limited?

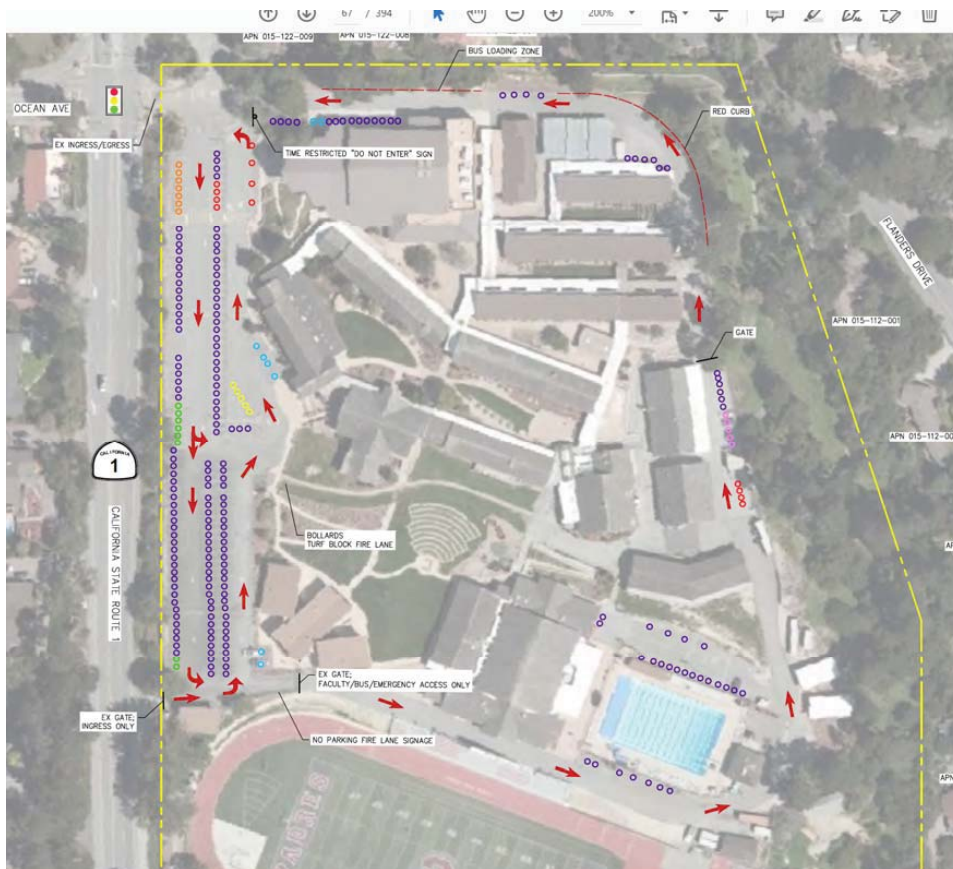
Why are you providing a limited visual view and photos of parking, traffic circulation, emergency access routes, fire lanes, pedestrian walk-ways, etc?

2 If your objective is to Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds, provide current benchmarking and proposed.

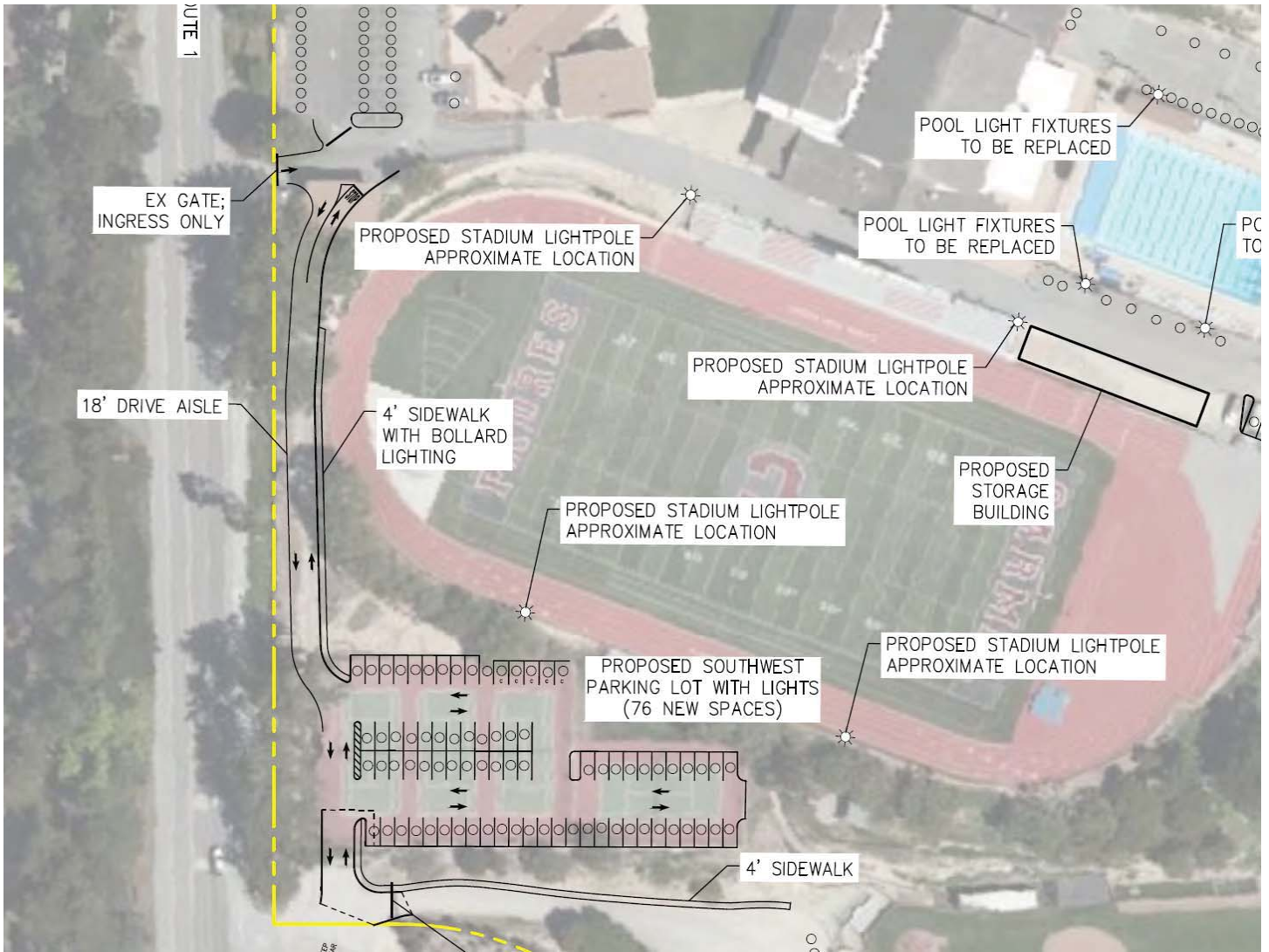
This photo is of the area right behind the Ex Gate marked Faculty/Bus/Emergency Access Only

**Questions:**

- Why are cars constantly parked right behind the bleachers? Can you confirm that it is in violation of the fire lane?
- If you Figure 3-6 indicates this is Emergency Access Only, shouldn't you have markings that indicate "No Parking" ? What about red curbs?
- Will you be using this roadway to access the new parking lot for 35 spaces? Is that safe?
- Do you have any current Emergency Access Routes for this whole section?
- Are the edges of the bleachers right on top of the road? Is that safe? How will you increase safety measures if you are growing traffic on this road?
- Wouldn't new parking spaces actually make traffic circulation worse in this area?
- Is it safe to put the proposed viewing platform right where parking is being built?







2  
con't.



## Response to Letter 14-6-d, Bud Get

1. Regarding project site photos, see response to Letter 14-5-w, comment 1.
2. This comment is about existing conditions and traffic circulation. The comment is repetitive of general comments previously stated by the commenter. Please refer to response to Letter 14-6-c, comment 2. Existing conditions are presented in Section 3.0, Environmental Setting, which also constitutes the baseline for the environmental analysis. This comment does not raise an environmental issue and therefore, no response is necessary.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 7:35 PM

Subject: RDEIR Feedback: Project Photos (Snack Shack and Roadway Safety)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

Why are your Project Site photos limited?

Why are you providing a limited visual view and photos of parking, traffic circulation, emergency access routes, fire lanes, pedestrian walk-ways, etc?

2

If your objective is to Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds, provide current benchmarking and proposed.

This photo is of the area right behind the Ex Gate marked Faculty/Bus/Emergency Access Only showing an illegally parked car right up against the snack shack.

**Questions:**

- Why aren't there additional safety markings in this area? Aren't any red markings, curbs or safety signs required?
- If you are going to encourage more traffic down this road, how will you make the snack shack safe?
- Wasn't improving the snack shack part of the Facilities Master Plan?
- Isn't the snack shack part of the athletic improvements?



## Response to Letter 14-6-e, Bud Get

1. Regarding project site photos, see response to Letter 14-5-w, comment 1.
2. This comment is about existing conditions and the snack shack. Changes to the snack shack are not included in the project description and are not part of the proposed project. The remainder of this comment is repetitive of general comments previously stated by the commenter. Please refer to response to Letter 14-6-c, comment 2. This comment does not raise an environmental issue and therefore, no response is necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 7:39 PM

Subject: Re:

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

Why are your Project Site photos limited?

Why are you providing a limited visual view and photos of parking, traffic circulation, emergency access routes, fire lanes, pedestrian walk-ways, etc?

2

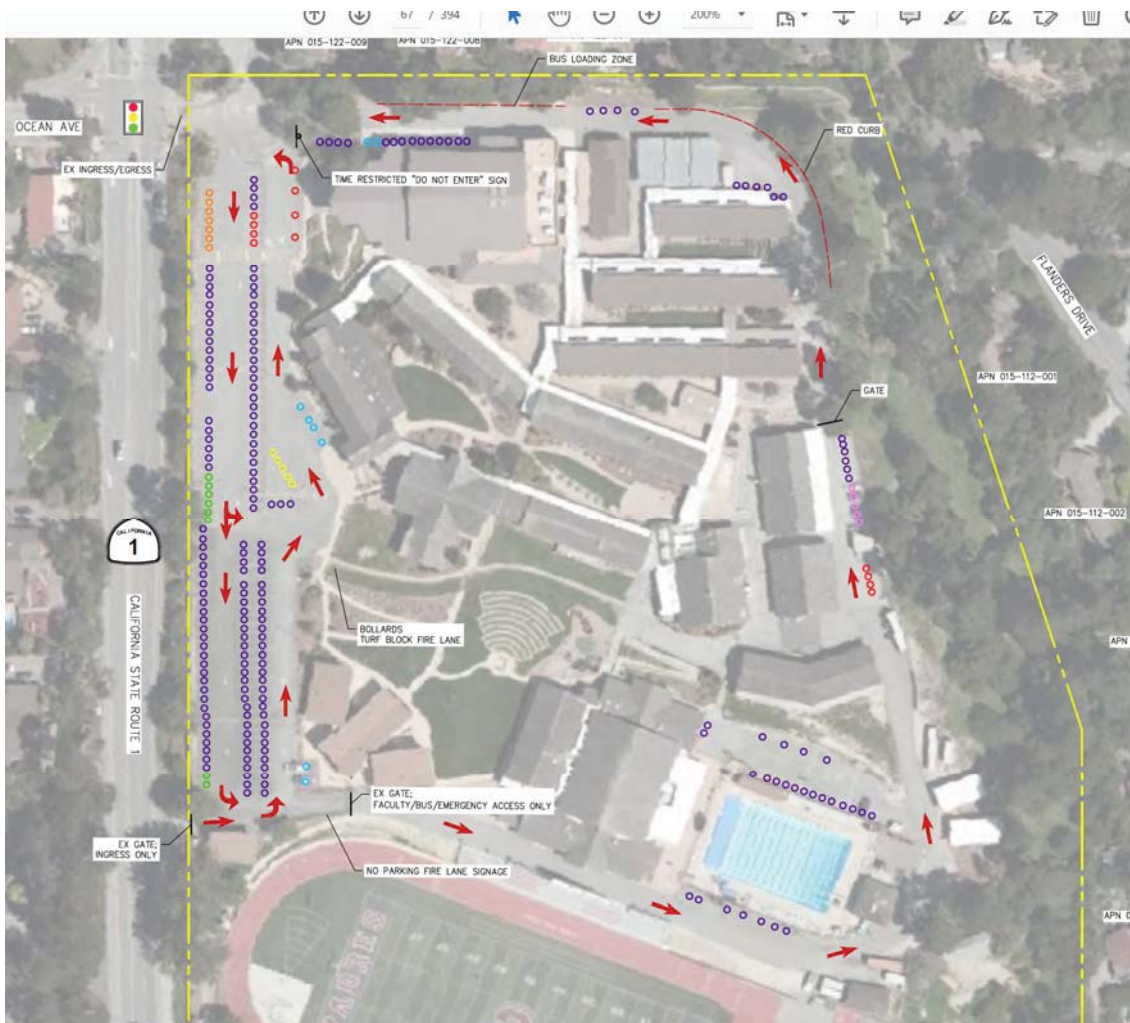
If your objective is to Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds, provide current benchmarking and proposed.

This photo is of the area right behind the Ex Gate marked Faculty/Bus/Emergency Access Only and right up against the bleachers

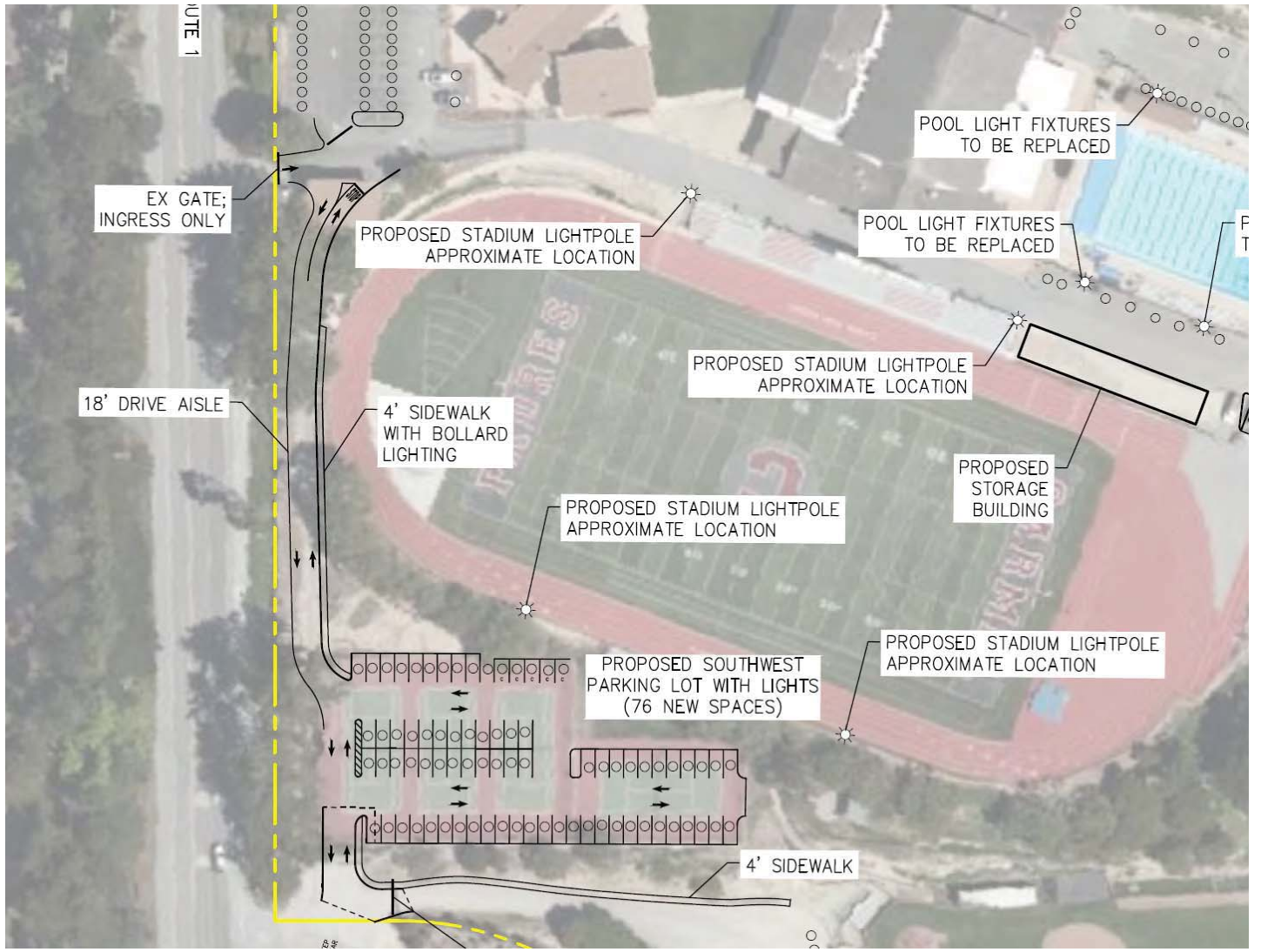
**Questions:**

- Why are cars constantly parked here? They aren't official parking spaces?
- Is this the road that will be used to access the new 35 parking spaces?
- Is this safe to encourage traffic on such a narrow road with no marking and right on-top of the bleachers?
- Why don't you have pedestrian walk-ways? How will people who use the new parking spaces safely walk on to the campus?

2  
cont.







## Response to Letter 14-6-f, Bud Get

1. Regarding project site photos, see response to Letter 14-5-w, comment 1.
2. This comment is about existing conditions and traffic circulation. The comment is repetitive of general comments previously stated by the commenter. Please refer to response to Letter 14-6-a and Letter 14-6-c, comment 2. Regarding the access road to the new parking lot east of the pool facility, see response to Letter 14-6-A.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 7:51 PM

Subject: RDEIR Feedback: Campus Condition Surrounding the New Parking Lots and Traffic Circulation Concerns

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1



Why are your Project Site photos limited?

Why are you providing a limited visual view and photos of parking, traffic circulation, emergency access routes, fire lanes, pedestrian walk-ways, etc?

The campus seems to have a lot of old trailers, rusted containers and not well maintained.

Why are athletic improvements being prioritized versus campus improvements for all the students?

What is this building? Will it be removed? Is this safe now?

## Response to Letter 14-6-g, Bud Get

1. Regarding project site photos, see response to Letter 14-5-w, comment 1.

This photo provided in the comment is of one of the two, 960-square-foot portable classrooms described on page 3-17 of the RDEIR, and pictured in Figure 3-5, Project Site Photographs – Perimeter Area near Existing Pool Site (picture 1). As discussed on page 4-6 in the Project Description, this portable classroom will be removed. This comment does not raise an environmental issue and therefore, no response is necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 7:43 PM

Subject: Re:

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 | Why are your Project Site photos limited?  
Why are you providing a limited visual view and photos of parking, traffic circulation, emergency access routes, fire lanes, pedestrian walk-ways, etc?

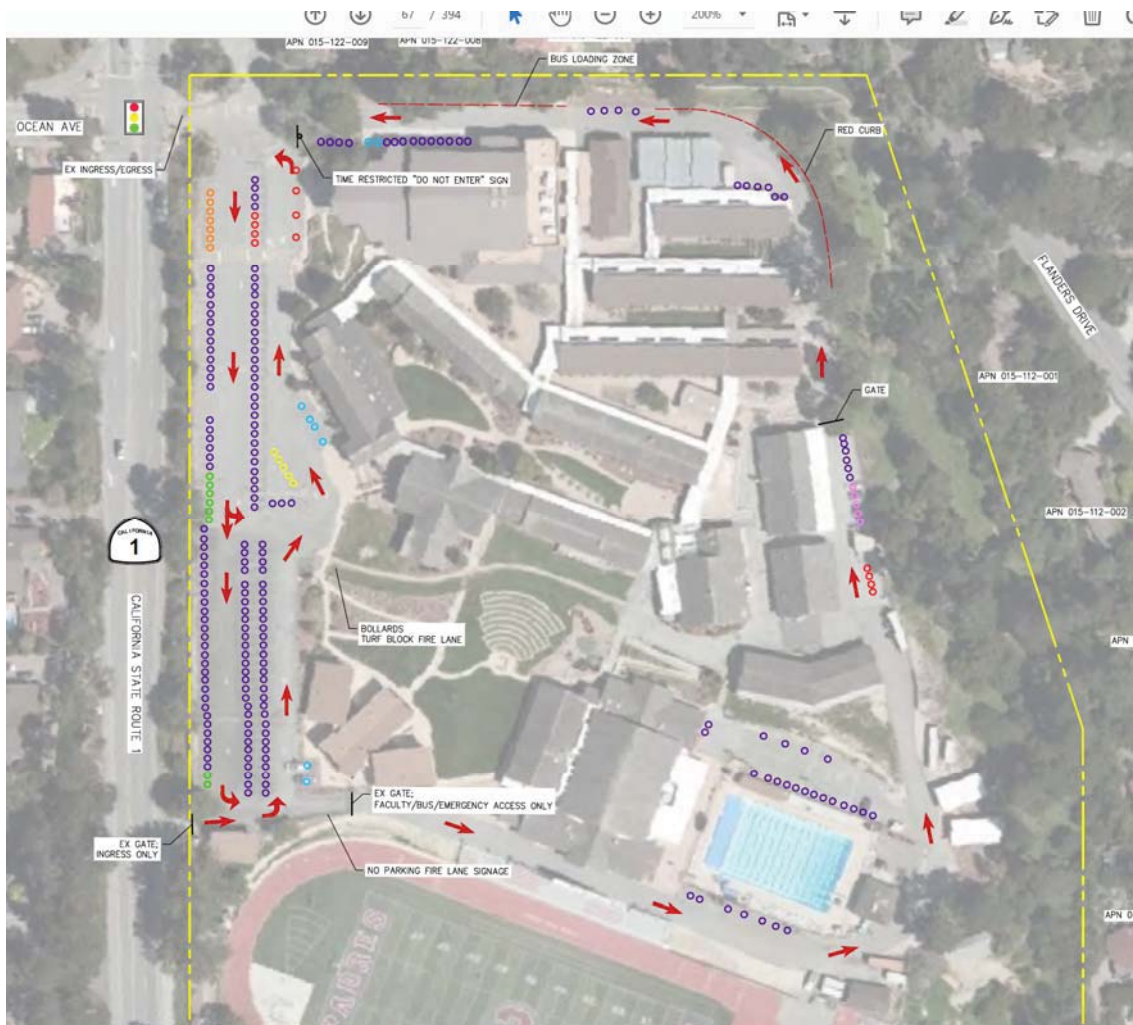
2 | If your objective is to Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds, provide current benchmarking and proposed.

This photo is of the area right behind the Ex Gate marked Faculty/Bus/Emergency Access Only and right up against the bleachers

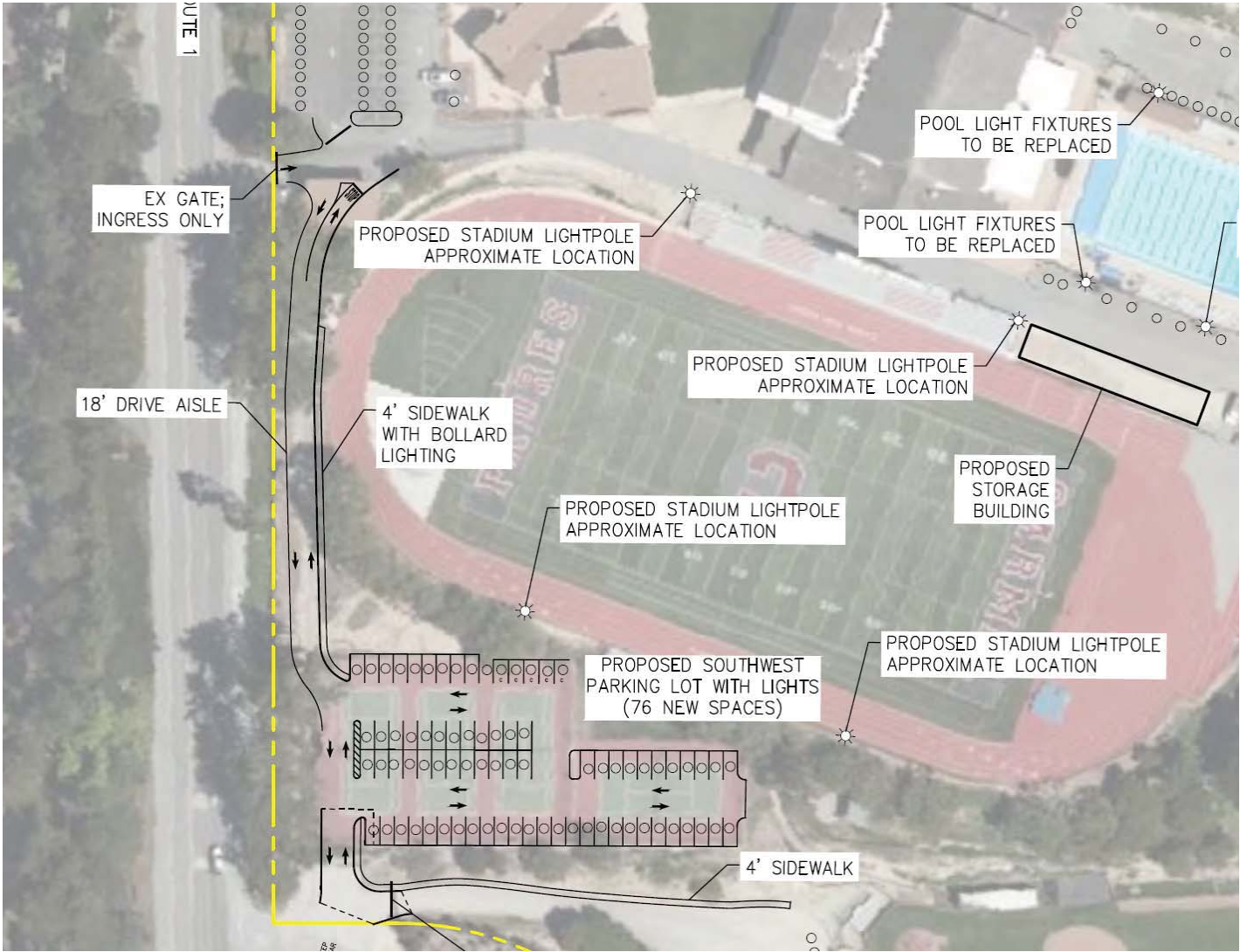
**Questions:**

- Will you have ADA Parking?
- Are current parking spaces behind the pool approved for the Emergency Access Route?
- The new parking spaces look like they will be on a grade? Is there erosion here? It looks very close to residential property line - have you captured air pollution data and potential?

2  
con't.







## Response to Letter 14-6-h, Bud Get

1. Regarding project site photos, see response to Letter 14-5-w, comment 1.
2. This comment is about ADA parking, current parking spaces, and current emergency access. The comment is repetitive of general comments previously stated by the commenter. Please refer to responses to Letter 14-6-a, Letter 14-6-c, comment 2, Letter 14-2-f, and Letter 14-2-g, comment 7. Regarding the new parking spaces replacing the tennis courts, they are replacing the tennis courts, which are currently on level ground. Soil disturbance would be minor. Regarding erosion, see Section 12.0, Soils, Erosion, and Water Quality of the RDEIR. Regarding air pollution, see Section 6.0, Air Quality, of the RDEIR.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Letter #14-6-i

Date: Fri, Oct 7, 2022 at 7:48 PM

Subject: RDEIR Feedback: Project Site Photos (Problematic Containers and Cheap No Parking Signs)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 Why are your Project Site photos limited?  
Why are you providing a limited visual view and photos of parking, traffic circulation, emergency access routes, fire lanes, pedestrian walk-ways, etc?

2 If your objective is to Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds, provide current benchmarking and proposed.

This photo is of the area right behind the pool area.

Will you be removing the gate access?

Will you be installing permanent No Parking Signs?

What is in those containers?

How long have those containers been there?

Are they safe? How many containers are you removing and keeping as part of this project?



## Response to Letter 14-6-i, Bud Get

1. Regarding project site photos, see response to Letter 14-5-w, comment 1.
2. This comment is regarding the area where new parking is proposed east of the pool. The comment is repetitive of general comments previously stated by the commenter. See response to Letter 14-6-a and Letter 14-6-g. This comment does not raise an environmental issue and therefore, no response is necessary.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Fri, Oct 7, 2022 at 7:54 PM  
Subject: RDEIR Feedback: Pool Parking Lot, Traffic Circulation and Safety  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

- 1 | Why are your Project Site photos limited?  
Why are you providing a limited visual view and photos of parking, traffic circulation, emergency access routes, fire lanes, pedestrian walk-ways, etc?
- 2 | Will you be improving this area as part of traffic circulation?  
Is there an erosion issue? How will this parking space connect with the one-way roadway?



## Response to Letter 14-6-j, Bud Get

1. Regarding project site photos, see response to Letter 14-5-w, comment 1.
2. This photo appears to be the existing parking immediately north of, and adjacent to, the pool. No changes are proposed here. This comment is not about the proposed project and does not raise an environmental issue. Therefore, no response is necessary.



----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 7:57 PM

Subject: RDEIR Feedback: Project Site Photos (Back Road for New Parking Spaces)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

- 1 | Why are you limiting photos of the project site around the new parking lots and proposed traffic circulation?  
Is this part of the proposed one-way road that will be used for access to the new parking spaces?
- 2 | Will this be changed? Where is garbage stored?  
Will pedestrian walk-ways and safety crossings be included?



## Response to Letter 14-6-k, Bud Get

1. Regarding project site photos, see response to Letter 14-5-w, comment 1.
2. The storage container and trash cans in the photo attached to this email are not part of the proposed project. This comment is not about the proposed project and does not raise an environmental issue. Therefore, no response is necessary.

With respect to pedestrian access, please refer to response to Letter 14-6-a.



----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 7:59 PM

Subject: RDEIR Feedback: Safety around the Auto Car Shop

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

According to your Figure 3-6, this area is part of your traffic flow and circulation for the new proposed parking spaces?

What will happen to this area? What will be cleaned up or kept?

How will this be safe with new traffic from the new parking lot?



## Response to Letter 14-6-I, Bud Get

1. Figure 3-6 of the RDEIR depicts Existing On-Campus Parking Spaces and Circulation. No improvements are proposed in the area where the photo attached to this comment email was taken. This comment is not about the proposed project and does not raise an environmental issue. Therefore, no response is necessary.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 8:00 PM

Subject: Re: RDEIR Feedback: Safety around the Auto Car Shop

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

Another photo of this same space from the other side. Is this safe?



## Response to Letter 14-6-m, Bud Get

1. See response to Letter 14-6-l.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 8:04 PM

Subject: RDEIR Feedback: Makeshift Eating on the Proposed ingress/egress roadway of new parking lot

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

It appears there is an outdoor eating area that is makeshift in between buildings but right on the roadway that will be used as ingress/egress for the new parking lot. Is this safe? Will it stay or be removed with this proposal?



## Response to Letter 14-6-n, Bud Get

1. This photo included in this comment is not on the campus ring road that would provide access to the proposed new parking lot east of the existing pool. No improvements are proposed in the area where the photo attached to this comment email was taken. This comment is not about the proposed project and does not raise an environmental issue. Therefore, no response is necessary.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Thu, Oct 6, 2022 at 7:22 PM

Subject: RDEIR Feedback: Project Site Photos (Backside of Stadium)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

- 1 | Why are your Project Site Photographs limited?  
Why are your Project Site Photographs not broader to show the whole athletic snapshot?

- 2 | If your goal with the RDEIR is to expand to "stadium improvements", we'd like to provide more in-depth and accurate photos of the project site.  
Below shows the backside of the stadium field and baseball field - both inter-connected

**Questions:**

- What is the plan for this area that intersects with the stadium and the top of the baseball stadium?
- Why is this not part of the RDEIR? This looks like it needs improvement and should be made safer.
- What is the big vision to incorporate this into a broader athletic plan?



## Response to Letter 14-6-o, Bud Get

1. Regarding project site photos, see response to Letter 14-5-w, comment 1.
2. Regarding the back side of the stadium and the photo attached to this comment email, the proposed project does not include any change at this location. It is not addressed in the RDEIR because it is not part of the proposed project. Please refer to Section 4.0, Project Description, of the RDEIR for a description of the proposed project. This comment is not about the proposed project and does not raise an environmental issue. Therefore, no response is necessary.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 8:12 PM

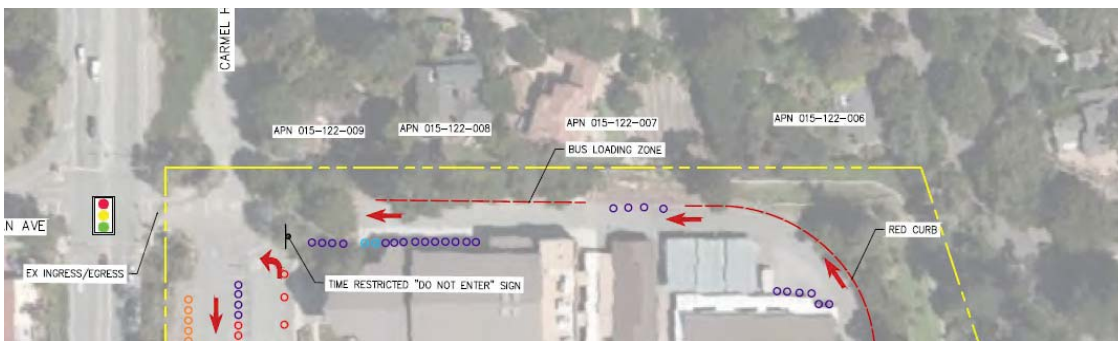
Subject: RDEIR Feedback: Ingress Roadway for New Parking Spaces

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

This is part of the roadway passengers will be using to exit from the new parking lot (35 spaces). Do you have an erosion problem? What is the orange netting for? Will you be improving safety markings on this road? We see Firelane marking but also a Bus Loading Zone - is this safe? What is the Emergency Access Route?



## Response to Letter 14-6-p, Bud Get

1. This comment is about the northern portion of the existing ring road around much of the campus. This is the existing roadway drivers would use to exit from the new parking lot east of the pool. This existing roadway is a baseline condition, and is depicted in Figure 3-6, Existing On-Campus Parking Spaces and Circulation. No changes are proposed or necessary for the existing ring road at this location, including the slope in the picture attached to the comment email.

----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 8:14 PM

Subject: RDEIR Feedback: Side Parking View

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 With more traffic being encouraged around the school for the new 35 parking spaces, how will this area be impacted?



## Response to Letter 14-6-q, Bud Get

1. The photo in this comment was taken from behind the performing arts center and shows the northern portion of the existing ring road around much of the campus, and its intersection with State Route 1 and Ocean Avenue. This is the existing roadway drivers would use to exit from the new parking lot east of the pool. This existing roadway is a baseline condition, and is depicted in Figure 3-6, Existing On-Campus Parking Spaces and Circulation. No changes are proposed or necessary for the existing ring road at this location.



----- Forwarded message -----

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 8:01 PM

Subject: Re: RDEIR Feedback: Safety around the Auto Car Shop

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1

One more photo.



## Response to Letter 14-6-r, Bud Get

1. This email contains a photo and the comment “one more photo,” but does not comment on the proposed project or raise an environmental issue. Therefore, no response is required. Please also see response to Letter 14-6-m.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 8:17 PM

Subject: RDEIR: Safety Challenges at the Exit Road for New Parking (35 Spaces)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

This area looks fraught for accidents and safety challenges. You are encouraging more traffic since this will be the exit for the new 35 parking spaces.

Will you be adding and pedestrian walkways?

Will you be changing when the gate will be open or closed?



1  
con't.



## Response to Letter 14-6-s, Bud Get

1. This comment is about the northern portion of the existing ring road and pedestrian access. See responses to Letter 14-6-a and Letter 14-6-q.



From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Fri, Oct 7, 2022 at 8:20 PM

Subject: RDEIR Feedback: Photos from the Project Site (No safe pedestrian walkways)

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

- Why don't you have safe pedestrian access and walkways here?
- Given you are increasing traffic with new parking requests, what safety measures are you putting in place for pedestrian traffic?
- Won't more parking challenge the traffic circulation further?
- Won't more growth on CHS challenge Emergency Access Routes?
- 





## Response to Letter 14-6-t, Bud Get

1. This comment is about additional parking, pedestrian access, and an assumption of safety issues. The addition of parking would assist in improving on-site circulation. Please refer to analysis under Impacts 11-2 and 11-4 in Section 11.0, Transportation and Parking, in the RDEIR. Regarding on-campus pedestrian safety and circulation, please see responses to Letter 14-6-a and Letter 14-2-f. Regarding emergency access, please refer to discussion under Impact 11-4 of the RDEIR, and please see responses to Letter 14-2-f, Letter 14-2-g, comment 7, and Letter 14-3-y.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Sat, Oct 8, 2022 at 10:12 AM

Subject: RDEIR Feedback: Lower Light Power and Lower High (Temporary Electrical Lights) and Use for Practices that aren't Football

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 | Is it accurate to say most of the events on **Table 4-2 Proposed Schedule of Stadium Uses (After Installation of Field Lights)** that potentially require lights would be practices for sports that require lower light power and lower height?

2 | If practices are the majority of the needs for lighting, why wouldn't temporary energy efficient LED sports field lights work for practices only and for the sports that don't require overhead lighting like football? You don't use referees for practices (soccer, field hockey, lacrosse) so why wouldn't portable lights mitigate some of the light pollution?

How many events really require the kind of stadium lights with that kind of power that don't dim? Just official football games that can still be played on weekend day games?

Why are we installing stadium lights with the highest level of environmental impact vs. solving for a majority of the athletic programs with the least amount of environmental impact?

Why can't we analyze those options of portable LED lights / on-site electric power that are efficient for a solution?

Provide another level of detail and comparison of LED Portable/Electric lights to the proposed stadium lights in environmental impact.

- Portable LED Lights can be run from external power or a user-supplied small generator (1000W). On-site electrical power is very energy efficient (NOT Diesel).

## Response to Letter 14-6-u, Bud Get

1. Regarding Table 4-2, Proposed Schedule of Stadium Uses (After Installation of Field Lights), this table presents all of the practices and games to be played at the stadium with implementation of the proposed project. As indicated by the start and finish times in the table, not all practices and games set forth in the table will occur after dark and require lights. See also response to Letter 2b, comment 2.
2. This comment is about portable lights and dimming the lights. Regarding portable lights, see response to Letter 14-1-t. Regarding dimming the lights for practices and all non-football games, no reduced lighting standards exist for practices, and therefore, the lighting standards that are professionally recommended will be employed for both games and practices. Should these recommendations change, the district should consider modifying the lighting intensity for practices. See also responses to Letter 2b, comment 2.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Sun, Oct 9, 2022 at 3:47 PM  
Subject: RDEIR Feedback: Appendix J (VMT Assessment)  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

**Hexagon references Table 4-2. However, that Table is very unclear.**

**Questions:**

- Why doesn't this table explicitly state which practices will actually turn on the lights? Will the lights be on for EVERY event list on this table?
- Why is your mitigation measure for only 44 games if Table 4-2 implies that stadium lights will on for 4-5 times power week for 9 month out of the year?
  - Aug-Nov: 4 different teams/groups using field 4-5 per week
  - Nov-Feb: 4 different teams/groups using field 4-5 per week
  - Feb-May: 5 different teams/groups using field 4-5 per week

2

• Won't light pollution be existing for ALL of the the above games? What is total number of days? What is the total number of events? During what times of the month?

3

• Wouldn't the cumulative light pollution environmental impact be DOUBLED as both the stadium lights and pool lights will be on for many of the events?

4

• Which events will have stadium lights and pool lights on at the same time? What days, times and length would the stadium lights AND pool lights be on?

5

• The appendix uses the word "generally end by 7:00 PM - "As shown in the table, use of lighting during and following athletic practices would generally end by 7:00 PM" Why can't you state a specific time for accuracy?

6

• The appendix misleading states says the games end 9:30 PM but more accurately the lights are not turned off until 10 PM? Should we care when the game ends when the light pollution continues until 10 PM?

7

• Can you provide specifics so we accurately understand not only the light pollution but the VMT implications in the entire report?

8

The VMT analysis continues to focus on just football games when TABLE 4-2 communicates that the number of attendees increases for all the sports in Table-4-2.

- Why are you inaccurately limiting the attendee inputs to just football games when the accurate attendee input should be for all increased attendees to all games?
- How many more attendees in TOTAL will be travelling to Carmel High School with the installation of the stadium lights? Why isn't this number inclusive to the VMT Analysis? It must be for accurate decision making. It's a significant difference to accurate decision making.

9 Estimates are not accurate or based on credible inputs:

- Why do you say attendees are "expected to increase from 500 to 800 for most football games"? How are you estimating the number of attendees? You have no historicals from actual games?
- Why are you only estimating football games? Can we have estimates for all the games/practices and new events that will be using the stadium lights?
- 10 • Aren't the events from Table 4-2 all being transferred from Carmel Middle School so all the data is new to the changes from the benchmark of the increase in both miles and attendees?
- 11 • You state "Attendance at all other sports games (soccer, lacrosse, and field hockey) is expected to be lower than that of football games' but how do we know that is accurate?
- What are the attendees for each soccer, lacrosse and field hockey game now? How do you know the estimate is accurate? Why isn't that total part of the VMT? Why are you limiting the inputs just to worst-case football games when three sports through 9 months is significant cumulative impact?

12 The VMT assessment methodology is inaccurate. It switches back and forth from VMT to LOS methodology when it suits the needs of the report:

- The VMT analysis utilizes a vehicle occupancy rate based on data previously collected for a homecoming football game on a Friday night at Mitty High School in San Jose, California.
  - How is Mitty School similar to Carmel High School? What is their student population? How large is their campus? How many parking spaces do they have? How large is their county? How far do students have to drive to get to school?
  - Why is the vehicle occupancy rate only for Friday Night Football? What data should be included for soccer, lacrosse and field hockey? Does Mitty High School have soccer, lacrosse and field hockey teams?
  - The report indicates Hexagon counted the number of vehicles parked at Mitty High School, at an adjacent church, and on the surrounding streets during the homecoming game on Friday, October 5, 2018, and on a regular Friday night on October 26, 2018. How is that relevant to Carmel High School? How far is that adjacent church to Mitty High School? Can you provide a visual of the surrounding streets and describe why this chosen example is at relevant and similar to Carmel High School?
  - Doesn't Mitty High School serves 1752 students which is double the number of students at Carmel High School? How is that example representative for Carmel High School?
- You provide the average trip increase per day for Friday night football games at Carmel High School (which is not accurate) but you don't provide soccer, lacrosse and field hockey teams? Why not? Shouldn't the total vmt equal to the inputs from Total of Evening Games per Year (Range) which is 74 - 100? Isn't a good portion of that NOT Football?
- Soccer in winter and lacrosse in the spring, might have an estimated increase from the current approximately 200 attendees to up to 500 attendees - that is 150% increase. This is significant enough to include in the VMT.
- We believe you have underestimated the increase of attendees for the other games soccer, lacrosse and field hockey. How are you accurately benchmarking the current state of attendees? How are you estimating increased attendees?

13 Bus Shuttle Trips

- Have you accurately captured that Carmel Middle School is part of the Carmel Valley Master Plan?
- Why are you not acknowledging the bus shuttle trips will likely study areas that fall within multiple jurisdictions and planning areas to include Monterey County and Carmel Valley Master Plan?
- Will the shuttle buses be green efficient? What type of eco-friendly transportation will the buses be?

- 13  
con't.
- If the buses are available for Friday night football games isn't that contradictory to buses and drivers available to implement Late Start? Will you be incentivizing the Football bus shuttles differently than who would be Late Start bus drivers?
  - Have you considered reserved parking systems for all the games that will increase in attendees and feed into the VMT at CHS to include soccer, lacrosse and field hockey?
- 14
- How many night games of soccer, lacrosse and field hockey with the stadium lights on will happen? When will they happen during the year?

15 VMT vs. LOS:

- If the County of Monterey and the Transportation Agency for Monterey County (TAMC), at the time of this report, have not yet adopted any analysis procedures, standards, or guidelines consistent with SB 743 and you rely OPR guidelines, why do you switch back and forth from VMT and/or LOS?
- Why does the VMT assessment inaccurately only focuses only on the increase in VMT due to the anticipated increase in attendees in just football games?
- Are you accurately counting the increase in bus shuttles AND the extra 2 miles per 2,000 attendees that will have to drive to the parking shuttle site at CMS?
- Why won't you have shuttle services for ALL the new games at CHS that will require stadium lights? if you only have 276 parking spaces and more than 600 attendees for soccer, lacrosse and field hockey show up for games will that not also increase traffic congestions, challenge traffic circulation at CHS and cause overspill parking to both sides of Highway 1 residential streets? How will you manage safety in dark unlight narrow residential streets?

16 Existing Roadway Network

- You omit benchmarks and existing insights into the impacted roadway from referenced reports from Keith Higgins:
- Existing operational deficiencies were not captured during accurate or similar windows of when any of the new nighttime events would happen. Why is that?
  - Why did you observe operational deficiencies from 5:00 PM to 5:30 PM when that is not similar to any games?
  - Why did you observe in June when school is no longer in session?

17 Intersection Operations

- You reference several traffic studies from Keith Higgins but those are LOS metrics? Are those valid inputs even though methodologies are different than VMT?
- Why don't you include in the Appendix the referenced CARMEL MIDDLE SCHOOL ATHLETIC FIELD EXPANSION TRAFFIC ISSUES STUDY (PREPARED BY KEITH HIGGINS, DATED AUGUST 15, 2018)?
- Since this report is now available from a CPRA Request, you omit several important factors that are critical to an accurate RDEIR and effective decision making input. Based on the level of service standards, don't several of the road segments operate at unacceptable levels of LOS? Wouldn't these unacceptable levels not only impact assess bus shuttle but the increase of attendees to all night games across football, soccer, lacrosse and field hockey?
  - Southbound (SB) Highway 1 from Ocean Ave to Carmel Valley Rd
    - Southbound Highway 1 between Carmel Valley Rd and Rio Rd\*
    - Southbound Highway 1 south of Rio Road\*
- According to the Keith Higgins August 15th 2018 Report - this SR 1 / Ocean has serious concerns. Can you speak to this reference below? Why wouldn't increase attendees across football, soccer, lacrosse and field hockey not further exacerbate the situation? Why aren't you including this in cumulative impact?



17  
con't.

- *D.1 Cumulative Conditions Intersection Operations*  
*All the study intersections are forecasted to operate at acceptable levels of service under Cumulative conditions with the following exceptions:*
  - *SR 1 / Rio Road*
  - *SR 1 / Ocean Avenue**These intersections are projected to operate at an unacceptable LOS D, E, or F under Cumulative traffic conditions.*

18 | You reference the Existing On-Site Parking Facilities and the 165 parking spaces but why don't you fail to include that the parking lot has serious traffic circulation challenges?

You reference the Existing on-site parking facilities but if one of the objectives is to improve traffic circulation, shouldn't you be conducting a Vehicular Traffic Study?

You reference the Proposed Parking Facilities but why don't you indicate that the new parking lots will not effectively traffic circulation and cause further traffic congestion on-campus and on Highway 1?

19 | Why are the new proposed parking spaces part of the increased VMT analysis on all the games from football, soccer, lacrosse, and field hockey? Where were these attendees parking prior? Isn't that an increase of NEW VMT to CHS?

20 | Is it your intent to identify Emergency Access Routes that will be submitted to the Division of the State Architect (DSA) along with an 810 Fire and Safety Form? Why or Why not?

21 | Why should recommended Temporary Traffic Control Measures be implemented for football games only when soccer, lacrosse and field hockey have the potential to attract as many increased attendees to the parking ratio available?

Why aren't the Temporary Traffic Control Measures in the Appendix J also inclusive of the residential streets on the other side of Highway 1? Is the Temporary Traffic Control Measures all voluntary? How would you prevent folks from parking on Hatton and/or Shafter Way?

22 | Thank you for recognizing that it is anticipated that a majority of attendees would drive to the school campus because of the lack of Pedestrian and Bicycle Access. Therefore, why are you encouraging walking within a 1 mile radius?

## Response to Letter 14-6-v, Bud Get

1. Regarding Table 4-2, Proposed Schedule of Stadium Uses (After Installation of Field Lights, see response to Letter 2b, comment 2 for clarifications and corrections. No additional changes to the RDEIR are necessary.
2. Regarding the total number of days, events, and months, see Table 4-3, Proposed Stadium and Pool Facility Lighting Schedule, presented on page 4-34 of the RDEIR. The table shows that the proposed stadium lights would be used approximately 147 days (including both practices and games) and that the length of time the lights would be on would range from about ½ hour to three hours, with a maximum of 3.5 to 5.5 hours for three games per year. Mitigation Measure 5-2a does restrict the number of games/meets played with a lighted field. See also response to Letter 2b, comment 2. No changes to the RDEIR are necessary.
3. The cumulative light pollution is simulated in Section 5.0, Aesthetics, of the RDEIR. See the nine visual simulations. Each includes the lights associated with the stadium, the pool, and the new parking lot south of the stadium.
4. The days, times and length the stadium lights and pool lights would be on is presented in Table 4-3, Proposed Stadium and Pool Facility Lighting Schedule, presented on page 4-34 of the RDEIR. No changes to the RDEIR are necessary.
5. The commenter questions the VMT analysis terminology “generally” regarding the time the lights will be turned off. And requests a specific time be identified for accuracy. The VMT analysis, Appendix J of the RDEIR, states, “The stadium lights would allow the school to provide flexible nighttime use of the field for various sporting and school events. Table 1 provides a summary of the anticipated use of the stadium with the proposed lighting. As shown in the table, use of lighting during and following athletic practices would generally end by 7:00 PM. Most athletic games would end by 7:00 PM, but no later than 9:30 PM (for example, Friday evening football games), with lighting potentially remaining on after to facilitate safe crowd exiting and for clean-up and other similar activities after game completion. It should be noted that the number of participants shown in the table does not include attendance of spectators.” Note that Table 1, Proposed Schedule of Stadium Uses (After Installation of Field Lights) in the VMT, is Table 4-2, Proposed Schedule of Stadium Uses (After Installation of Field Lights), in Section 4.0, Project Description, of the RDEIR. The use of the term “generally” is appropriate for this discussion. No changes to the RDEIR are required.
6. The commenter is concerned that the lights would not be turned off immediately after the games end. It is estimated that ½ hour is sufficient for spectators, players and changes to vacate the stadium. The lights would need to stay on until the stadium is vacated. Therefore, if a game ends at 9:30, the lights could be expected to be turned off by 10:00. No changes to the RDEIR are necessary.

7. Regarding light pollution, see Section 5.0, Aesthetics. Regarding the VMT analysis, see Section 11.0, Transportation and Parking. No changes to the RDEIR are required.
8. This comment is regarding the VMT analysis methodology. See Section 11.0, Transportation and Parking, as well as response to Letter 14-3-a for an explanation of the VMT analysis methodology. No changes to the RDEIR are necessary.
9. This comment is about existing and projected attendance at games, and estimates for practices. Table 3-1 in the existing setting of the RDEIR presents the existing schedule of stadium uses, using the 2022-2023 school year. Table 4-2 in the project description of the RDEIR presents the proposed schedule of stadium uses after implementation of the proposed project. It includes every sports team that will use the stadium for both practices and games, the days of the week, starting and ending time, the number of participants (student-athletes, coaches and staff), and the estimated number of practices/home games per year. No changes to the RDEIR are necessary. Please also refer to response Letter 5, comment 6.
10. This comment is regarding events being transferred from Carmel Middle School. Table 4-2 Proposed Schedule of Stadium Uses (After Installation of Field Lights), in Section 4.0, Project Description, does not represent the events being transferred from Carmel Middle School. Table 3-4, Existing Off-Site Practices and Games, presents an accounting of the existing off-site practices and games, and Table 4-5, Proposed Off-Site Practices and Games, presents an accounting of the proposed off-site practices and games with implementation of the proposed project. The difference between the existing and proposed is discussed following Table 4-5 on pages 4-36 and 4-37. No changes to the RDEIR are necessary.
11. Regarding attendance at soccer, lacrosse, and field hockey, historical attendance data and observations by the high school athletic department staff shows that attendance at these three sporting events are not as high as football. However, as discussed on page 4-35, an average spectator attendance increase for soccer is identified as new spectators at Carmel High School due to the relocation of soccer junior varsity matches from Carmel Middle School to Carmel High School. An additional footnote has been added to Table 4-4, Anticipated Increase in Spectator Attendance, in Section 4.0, Project Description, which clarifies the anticipated attendance increase for sports other than football and soccer. See Section 3.0, Changes to the Revised Draft EIR, for this addition. Regarding total VMT, see Section 11.0, Transportation and Parking, as well as response to Letter 14-3-a for an explanation of the VMT analysis methodology. See also Appendix J.

12. Regarding total VMT, see Section 11.0, Transportation and Parking, as well as response to Letter 14-3-a for an explanation of the VMT analysis methodology.

Regarding an “LOS” methodology, although the VMT analysis did report on level of service (LOS) at vicinity intersections provided in a 2017 study, it was provided for baseline conditions for operational and safety issues. LOS analysis was not conducted for the proposed project, as it is no longer a metric by which to evaluate transportation impacts in accordance with CEQA. The VMT assessment is accurate, and does not switch back and forth from VMT to LOS methodology when it suits the need of the report.

Regarding the vehicle occupancy rate estimates, see response to Letter 14-3-j, comment 1.

13. Regarding shuttle buses that would be used as part of the Traffic Management Plan, Mitigation Measure 11-4 in Section 11.0, Transportation and Parking, these shuttle buses would only be used a few times per year during the highest attended games. Drivers for these shuttle buses would not be the same drivers used during the day for regular school bussing. Regarding whether the busses are “green,” the air quality modeling inputs discussed in Section 6.0, Air Quality, and Section 9.0, Greenhouse Gas Emissions, assumed no alternative-fuel powered shuttles (i.e., non-diesel or gas powered) where credit could have been taken for lower GHG emissions. Please also see response to Letter 14-2-g, comment 5, as well as response to comment 15 below.
14. Regarding games and practices for soccer, lacrosse and field hockey, their schedules are provided in Table 4-2, Proposed Schedule of Stadium Uses (After Installation of Field Lights). Practices and games that don’t end before dark will require lights. The total number of days and hours the lights are expected to be on for all games and practices is presented in Table 4-3, Proposed Stadium and Pool Facility Lighting Schedule. See also response to Letter 2b, comment 2.
15. Regarding VMT and LOS, see response to comment 12 above.

Regarding VMT methodology, see Section 11.0, Transportation and Parking, as well as response to Letter 14-3-a for an explanation of the VMT analysis methodology.

Regarding shuttle bus trips, the VMT associated with these trips is discussed in the VMT analysis (Appendix J) on page 6 and the VMT associated with these trips was included in the analysis of the VMT for the worst-case scenario.

Regarding shuttle services for all new games at Carmel High School, the proposed project does not result in any new games played at the high school, with the exception of JV soccer, which currently plays at Carmel Middle School. With implementation of the proposed project, the JV soccer team will no longer need to travel to Carmel Middle School and

therefore, would result in a decrease in VMT. Parking would be sufficient for all sporting events except those events requiring implementation of the Traffic Management Plan (TMP) which would be once or twice a year for homecoming and/or rivalry football games. See Section 11.0, Transportation and Parking, for further discussion.

16. Regarding the existing roadway network, see response to comment 12 above.
17. Regarding LOS, see comment 12 above. Regarding anticipated increase in attendance during sporting events, see Table 4-4, Anticipated Increase in Spectator Attendance. Attendance is anticipated to increase at football and soccer games only. Regarding the Keith Higgins traffic studies referenced in the comment, there are two studies relevant to the comment. One is a December 2017 traffic impact analysis prepared by Keith Higgins for a previous commercial project (Rio Ranch Marketplace). Hexagon Transportation Consultants utilized this 2017 report to obtain existing operations along State Route 1 (due to the COVID-19 pandemic and its effect on normal traffic patterns). See page 8 of the Hexagon VMT analysis (Appendix J of the RDEIR) for additional details. The second Keith Higgins report is an August 2018 traffic study prepared for the Carmel Middle School Athletic Field Expansion project, which is not relevant to the proposed project. See also response to comment 11, above, and response to comment 1 for Letter 14-1-h for a link to the 2018 IS/MND prepared for the Carmel Middle School Athletic Field Expansion project. This comment does not raise an environmental issue and therefore, no response is required.
18. This comment is about circulation associated with the two new parking areas. The parking areas and associated access and circulation are presented in Figure 4.6, Post Development Overall Parking Exhibit. The comment alleges that the existing parking lot has “serious traffic circulation challenges”, but fails to identify what these alleged challenges are. This comment does not raise an environmental issue and therefore, no response is required.
19. Additional VMT from the increase in spectators is address in Appendix J and Section 11.0, Transportation and Parking, of the RDEIR. No changes to the RDEIR are required.
20. Comment note. This comment does not raise an environmental issue and therefore, no response is required.
21. The Traffic Management Plan is required during the highest attended events, when it is anticipating that on-campus parking (including the new 111 spaces) would not be sufficient. It should be noted that on-campus parking is sufficient for all soccer, lacrosse, and field hockey games. See also response to comment 11, above, and response to Letter 14-1-q, comment 2.
22. Regarding walking and biking to campus, see response to Letter 14-1-k and response to Letter 14-1-q, comment 2.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Sun, Oct 9, 2022 at 3:52 PM  
Subject: RDEIR Feedback: Land Use and Planning  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 | Why doesn't the RDEIR address if the project will result in an Environmental Impact Due to a Conflict with Land Use Plan, Policy, or Regulation?

Isn't this project under the jurisdiction of three General Plans including General Monterey Peninsula, Carmel-by-the-Sea AND Carmel Valley Master plan if you are diverting traffic mitigation planning in their jurisdiction (location of Carmel Middle School)?

Wouldn't this project conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating environmental effects under Visual character? For effective decision making, can you provide the next level of detail for each of the General Plans in how you are specifically violating each General Plan in each of the jurisdictions?

Why have you referenced the General Monterey Peninsula Plan but not clearly linked which ordinances, regulations and/or policies you might be at risk in violating?

Carmel Middle School is under the Carmel Valley Master Plan. Won't your Traffic Mitigation Plan divert more traffic and parking problems to Carmel Valley?



## Response to Letter 14-6-w, Bud Get

1. Regarding land use plans, policies, and regulations, see response to Letter 2b, comment 4 and Letter 11b, comment 16.

Regarding visual character, see Section 5.0, Aesthetics, in the RDEIR.

Regarding traffic and parking problems in Camel Valley at the Carmel Middle School, the Traffic Management Plan includes shuttling spectators to and from the high school during the highest attended games only (see Section 11.0, Transportation and Parking). The alternative of constructing a lighted stadium at Carmel Middle School (see Section 18.0, Alternatives) would result in more traffic or Vehicle Miles Traveled at the middle school than would the proposed project. In general, as discussed on pages 4-35 & 4-36 of the RDEIR, the number of students leaving the campus pre-project is greater than the number of students that would be leaving the campus post-project.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Mon, Oct 10, 2022 at 7:23 AM  
Subject: RDEIR FEEDBACK: Assessing Alternatives at MPC & PG High School  
School To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

**You state:**

MPC staff indicated that their lighted stadium would not be available until 8:00 P.M. on Tuesday, Wednesday, or Thursday, and not until 6:00 P.M. or 6:30 P.M. on Monday and Friday, if not being used by other outside organizations (Wendy Bates, MPC Athletic Director, e-mail message, November 11, 2021).

However, that is not accurate according to the e-mail referenced that was released through a CPRA request. Why aren't you including that?

- Why did Coach Golden Anderson only request availability for the Winter Season? Quote "*Would MPC be willing to rent out the stadium in the evenings once your teams finish in the Winter Season (Nov - Feb).*"
- If light pollution is present during all proposed schedule of stadium uses after installation of field lights (Table 4-2), why didn't Coach Golden Anderson inquire about MPC availability for Fall Sports and Spring Sports?
- Are the types of lights needed for Fall Sport different than Winter Sports and Spring Sports?
- Why can't Mitigation Measure include all football games at MPC and other alternatives for each of the seasons?

For PG High School, you reference (Lauralea Gaona, PGUSD, e-mail message, October 26, 2021). However, that e-mail has not been released through a CPRA request. Why not?

- Was Coach Golden Anderson's request only for availability for the Winter Season?
- Was Coach Golden Anderson's e-mail request inclusive of Fall Sports?
- Was Coach Golden Anderson's e-mail request inclusive of Spring Sports?
- This information would be important to all decision makers since light pollution is significant and unavoidable. Why haven't all alternative possibilities been explored as Mitigation Measures?

## Response to Letter 14-6-x, Bud Get

1. Comment noted. The comment is about email communications between the high school athletic director and the Monterey Peninsula College (MPC) athletic director and Pacific Grove High School (PGHS) staff, and the alternative regarding holding practices and games at MPC or PGHS. This alternative was evaluated in the RDEIR. See Section 18.0, Alternatives, beginning on page 18-8, Alternative 3: After Dark Practices and Games at Alternative Locations (Monterey Peninsula College and Pacific Grove High School). The school district followed up with MPC staff and the facility would also be available for use in the fall and spring. The comment does not raise an environmental issue about the alternatives and therefore, no response is necessary.

It is acknowledged that the proposed project (in the vicinity of Carmel High School), as well as Alternative 3 (in the vicinity of the PGHS and the MPC campus), would result in significant and unavoidable light impacts. The comment suggests a mitigation measure to play all football games at MPC “and other alternatives for each of the seasons”. It is unclear if the commenter is suggesting this as a mitigation measure to the proposed project, or as mitigation measure to Alternative 3. However, this mitigation measure is infeasible and ineffective. Playing all football games at MPC would not mitigate the aesthetic impacts for the proposed project because there would still be extended lighting impacts at MPC for the football games, and at Carmel High School for all other lighted events. The proposed mitigation measure would likewise not reduce the aesthetic impacts of Alternative 3 discussed on page 18-15 of the RDEIR. In addition, “other alternatives for each of the seasons” is too vague and incomplete to gauge its effectiveness. No changes to the RDEIR are needed.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Mon, Oct 10, 2022 at 11:10 AM

Subject: RDEIR Feedback: Impact of Light Pollution on Sensitive Ecosystems

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 Environmental Impacts under the Biological Resources are vastly underestimated and not fully disclosed or examined. Why are you limiting the visual impact of the light pollution to 3.5 mile radius? What is the full impact of its reach to zero?

We want greater consideration to the potential impacts of light pollution on the sensitive ecosystems and species in the vicinity of the project.

Below is a recent article on light pollution and monarch butterflies.

Why do you have monarch butterflies listed in Table 7-2 as unlikely to occur on the site because "suitable roost trees not found at project site" when in fact this does not address the possible impact of light pollution on migrating monarch or on overwintering monarch roosting within the range of potential light impacts?

[ARTICLE:](#)

[Light pollution can disorient monarch butterfliesEven a single nearby light can throw off the butterfly's internal compass, UC biologists say](#)

Beyond the article above, there is significant research in science publications that found artificial light is detrimental. Given Point Lobos is an important ecosystem, shouldn't you even assess light impacts beyond butterflies to include birds? You are underestimating your impact on the environment on a highly sensitive area.

<https://www.sciencedirect.com/science/article/pii/S2589004222005818>

## Response to Letter 14-6-y, Bud Get

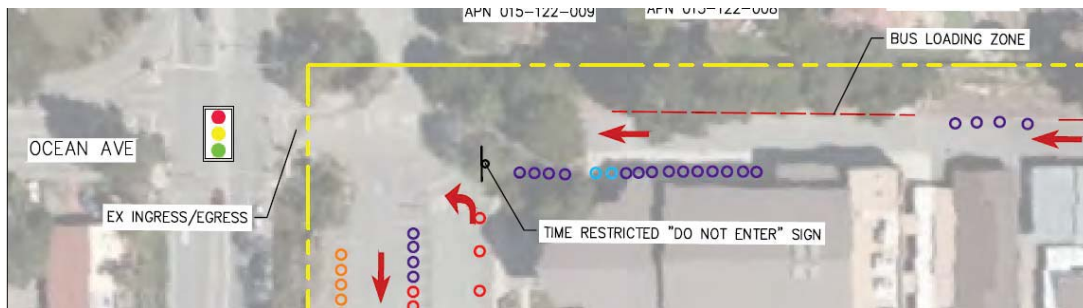
1. See response to Letter 157.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
Date: Mon, Oct 10, 2022 at 11:34 AM  
Subject: RDEIR Feedback: Objective to Improve Traffic Circulation  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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If your objective is to improve traffic circulation, and emergency access routes can you specify the exact time restriction of the "Do Not Enter" Sign on Figure 3-6?  
How did you determine what is that time restriction and might that change with your proposed new parking lots, especially the 35 spaces that will require this exit as egress?

Exactly where are the locations of your school bus drop offs and pickups and why aren't they marked on either Figure 3-6 and/or 4-1? How might those drop-offs and pick-ups for school buses change with the proposed parking lots and their circulation?





## Response to Letter 14-6-z, Bud Get

1. This comment is about an existing stop sign on campus. Regarding the comment about the proposed new parking lot that will use this as an egress: this comment is correct. The new 35-space parking lot would use the loop road to go north, then west to exit here. Refer to the arrows on Figure 3-6, a portion of which was provided in this comment email. No changes to bus drop off and pick-up locations are proposed. The comment does not raise an environmental issue and therefore, no further response is required.

From: **Bud Get** <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>

Date: Mon, Oct 10, 2022 at 11:38 AM

Subject: RDEIR Feedback: 3-D visuals to show impact of stadium poles during day

To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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We've requested that story balloons, poles or other 3-D visuals be installed to clearly communicate what aesthetics will be damage during the day with the installation of the stadium 80 foot poles.

Below is a photo of crane on the grounds of the High School. Can that be used to demonstrate the visual impact to aesthetics during the day?



## Response to Letter 14-7-a, Bud Get

1. Regarding story balloons, poles, or other 3-D visuals, see response to Letter 2c, comment 1.

Regarding the crane, a crane would not represent how an 80-foot light pole would look on campus. According to school district staff and the crane operator, this crane pictured was not fully extended at the time and is approximately 120 feet tall as shown in the picture. In addition, the crane as shown in the picture is parked at an elevation 30 ft higher the stadium, which would put the top of the boom at 150 feet above the field. The crane itself has a maximum height of 137 feet. Visual simulations regarding how they would look from various locations are included in Section 5.0, Aesthetics.

On Wed, Sep 7, 2022 at 2:26 PM [shelyons@gmail.com](mailto:shelyons@gmail.com) <[shelyons@gmail.com](mailto:shelyons@gmail.com)> wrote:

Ted,

It was great to see you at Ohana Day. You are such a good sport! I wish I had my camera though because it was awesome photos!

And Tular is working so well for our son. He finally is welcomed and fitting in. It's night and day of an experience. So thank you for that too.

- 1 | I'm highly concerned about these lights after reading a local article. I had no idea that CUSD is eliminating the tennis courts. The CHS PE (which is expanding to 10th grade) and the tennis teams use them, besides other students in the off-season. I thought these lights were supposed to help sports at CHS but I (and other parents) are really scared it's going to be a huge cost to more students than it will benefit. I really hope you consider putting the lights at CMS where there is more room for parking (and much more parking available), where it will benefit more students for many more sports. I know that it's not about football anyway but winter sports, but there is a football field there too.
- 2 | With all these changes, please reach out to the entire CUSD population and let them know. There's no way that most of the CUSD families and students know that the cost of these lights are all the tennis courts and the beautiful trees that run alongside Highway 1. That is heartbreaking to me, but mostly I am concerned about what the students and other families think. I hope you decide to run a survey and ask families if they prefer lights at CMS which won't have these non-monetary costs.
- 3 | Also, can you confirm that CUSD will be using LED targeted lights with the least amount of light pollution? And if so, can you please let the entire CUSD population also know this fact, too, because I think it will provide a lot more support for lights (yes at CMS but lights in general). I noticed that the light pollution issue has really been reduced with new technology and that's a great fact to advertise!

Thank you for your service.

Warmest,

Shel

## Response to Letter 15a, Shel Yons

1. The commenter discusses their concern about the implications for the removal of the tennis courts at the high school and impacts to the tennis teams. The purpose for removing the tennis courts is to provide for additional on-campus parking, in response to public comments during the public review period for the original DEIR. Please refer to Subsection 1.5 of the RDEIR and responses to Letter 11b, comment 16, and Letter 14-1-u, comment 1. As discussed in the RDEIR, removing the tennis courts would require the tennis teams to practice off-site at the existing tennis courts at Carmel Middle School. The tennis teams (approximately 48 players – refer to Table 4-5 Proposed Off-Site Practices and Games in the RDEIR) currently play home matches off-site and that would continue with implementation of the proposed project. PE instruction would remain at the Carmel High School campus.

The commenter also discusses putting the stadium at lights at Carmel Middle School. Section 18.0, Alternatives, of the RDEIR discusses the alternative of constructing a lighted stadium at the middle school. Please refer to Alternative 4, set forth in the RDEIR. No changes to the RDEIR are required.

2. Comment noted. The commenter requests the school district provide extensive community outreach to ensure disclosure of project impacts including implementation of the stadium lights. Please refer to Subsection 1.5 of the RDEIR and responses to Letter 11b, comment 16, and Letter 14-1-u, comment 1. This comment does not raise an environmental issue and therefore, no response is required.

The commenter also states that the cost of the lights are the tennis courts and the beautiful trees along State Route 1. For clarification, no tree removal is planned as part of the proposed project; although the potential for tree removal as a result of the proposed project is addressed in Section 7.0, Biological Resources, of the RDEIR. The RDEIR evaluates the potential for trees to be damaged or removed, although none are proposed for removal. The location of the trees is identified in Figure 7-1, Habitat Map. As discussed on page 7-32 of the RDEIR, although project plans do not call for the removal of any of these trees, the planned construction of a new drive aisle and parking spaces could potentially jeopardize tree health through damage to roots and paving under tree driplines, resulting in the potential need to remove the trees. Mitigation Measure 7-6 states, “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.”

3. The commenter requests confirmation that the school district will be utilizing LED lights with the least amount of light pollution. Both the proposed stadium and replacement pool lighting designs will include LED light fixtures to minimize light spill and focus surface lighting to the playfield and/or pool and seating areas. As discussed in Section 4.0, Project Description, and in Section 5.0, Aesthetics, the school district submitted the proposed stadium lighting design for Dark Sky certification and received design analysis (Phase I) approval from the International Dark-Sky Association (IDA) on October 27, 2021. The LED light pool light fixture designs were also submitted to the IDA and received design analysis approval for Dark Sky certification on July 29, 2022. The Lighting Performance Summary Results provided by IDA in evaluating the proposed stadium lighting and pool lighting designs are included as Appendix D of the RDEIR. With respect to the comments on public outreach, please refer to response to comment 1, above.



From: [shelyons@gmail.com](mailto:shelyons@gmail.com) <[shelyons@gmail.com](mailto:shelyons@gmail.com)>  
Date: Thu, Sep 8, 2022 at 9:29 AM  
Subject: Re: Tennis Courts turned into a parking lot?  
To: Ted Knight <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>

Ted,

Oh, I understand. Thanks for your email and explaining. It definitely makes things easier to understand why CUSD hasn't made any of these details available for the CUSD families through an email from the superintendent. While I really don't like learning stuff from social media and I believe transparency builds trust with our community, I understand that the lawyer has advised CUSD/you against such communication. At some point, if you are allowed to communicate more, please do. I would love a survey on how many people want those tennis courts gone. Meanwhile, please add these comments:

- 1 | 1) Please do not remove high school tennis courts. High school students should have tennis courts on campus to play tennis during PE, after school, and two (2) tennis seasons (fall and spring). It makes no sense to add lights for one (or two) sport(s) and take it away from another two (girls and boys tennis). I think lights can be added without removing the tennis courts as those are used by too many high school groups.
- 2 | 2) I am concerned about Title IX in terms of where female players practice (e.g., softball, now girls tennis, and whether girls soccer will get the lights). For instance, why wasn't the baseball fields removed instead? It seems that the male dominated sports are being favored.
- 3 | 3) I want to ensure CUSD uses LED lights that lead to minimal light pollution. There has been amazing technological advances where the lights can be focused on the field only.
- 4 | 4) I believe CMS should be considered as an alternative site if all of numbers 1-3 are not viable.
- 5 | 5) I believe the CHS site council which is a group of parents, teachers, admin, staff, and students should have been consulted and they were not. This is the entire purpose of the site council and it seems unethical to exclude them from the decision to eliminate the tennis courts. That is a huge decision and no one was informed.
- 6 | Thank you for allowing me to add my comments to the record. Of note, I do not live by the high school so I have no personal or economic stake in the decision but I have 4 kids in CUSD schools so the decision to eliminate CHS tennis courts will negatively affect my children for the next 10 years.

Warmest regards,

Shel

## Response to Letter 15b, Shel Yons

1. Comment noted. The commenter expresses their concerns for access to tennis courts for all Carmel High School students and the high school tennis teams as a result of removing the existing tennis courts at the high school. See response 1 to Letter 15a. No environmental issues are raised and therefore, no response is necessary.
2. Comment noted. The commenter expresses their concern for Carmel High School female student athletes as a result of the proposed project and the school district's compliance with Title IX. The proposed project would not conflict with Title IX. The school district provides equal access to the athletics facilities at both Carmel High School and Carmel Middle School. As shown in Section 4.0, Project Description of the RDEIR, in Table 4-2, Proposed Schedule of Stadium Uses (After Installation of Field Lights), girls field hockey, girls soccer, and girls lacrosse would all hold practices and games (including evening games under the stadium lights if implemented). Table 4-5, Proposed Off-Site Practices and Games, of the RDEIR, highlights how both girls softball and tennis teams would be accommodated at the middle school or other off-site locations. With respect to the comment's question regarding removal of the baseball field instead, please refer to responses to Letter 14-1-g, comment 4, and Letter 14-2-o, comment 2.
3. See response 3 to Letter 15a.
4. This comment advocates locating the project at Carmel Middle School if accommodating the commenter's requests for comments 1-3 above is not viable. Alternative 4, Alternative Location (New, Lighted Stadium at Carmel Middle School) for Practices and Games, is discussed and evaluated as an alternative to the proposed project in Section 18.0, Alternatives of the RDEIR.
5. Comment noted. This comment does not raise an environmental issue and therefore, no response is necessary. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.
6. Comment noted. No environmental issues are raised and therefore, no response is necessary.

On Thu, Sep 8, 2022 at 5:05 PM Tristan Mabry <[mabryt@mac.com](mailto:mabryt@mac.com)> wrote:

Dear CUSD:

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I am writing in strong support of the Carmel High School (CHS) Stadium Improvements project.

I am the father of two teens at CHS (9th and 11th grades) and a homeowner in Carmel by the Sea (very near the campus). I believe the improvements are overdue and that the planning has been conscientious. Opposition to the improvements based on some claim of “protecting the environment” ring hollow.

My principal drive in writing in support, however, goes beyond the need for facility upgrades. It is in regard to finally implementing the later start time of 8:30 a.m. (as most other high schools in the county and state have done already). I understand the issue of sports teams practicing in the dark, and therefore the need for lights, and hope that once the lights are installed CHS will change its schedule immediately.

This may not happen in time to help my chronically sleep-deprived Junior, but perhaps my Freshman will eventually benefit from the later start time. That is my hope.

Sincerely,

Tristan Mabry  
4SE4 Guadalupe Street  
Carmel-by-the-Sea, CA 93921

## Response to Letter 16, Tristan Mabry

1. The commenter expresses support for the proposed project and for Late Start, but does not comment on the RDEIR. Therefore, no response is necessary.

September 9, 2022

Dear Dr. Knight:

1 | On behalf of Seaside native and Carmel Resident Herm Edwards and myself, we would like to take this opportunity to advocate for the Carmel community and the students at Carmel High School by expressing our support for the Stadium Improvement Project and specifically the stadium lights. When a decision needs to be made on November 29th, let's make it the best one for the Carmel community and the current and future students at our high school.

We were introduced to the project this summer when we learned of a handful of community members who were not in support of the project. Yes, Herm and I both come from careers in athletics as a football coach and athletic administrator respectively so hearing that there is controversy to put up stadium lights for the students to experience the opportunity to play or support their team on a Friday night or any night for that matter, is puzzling to us. However, we do respect and appreciate differences of opinions, but this particular project embraces the concept of community.

In 1985, Herm created the Herman L. Edwards Family Youth Foundation with the goal of making a direct impact on the lives of children on the Monterey Peninsula. We hosted a free football camp for 10 consecutive summers on the Monterey Peninsula for our youth. At one point, the camp participants exceeded over 1000 young men and women. To learn of the Stadium Improvement Project taking place in our community that will make a positive difference in the lives of so many people is what we advocate.

Change is hard. Change is inevitable, but let's not allow the Carmel community to be left behind. The secret is already out. Carmel is a wonderful place to live and visit. You will find that every day of the week if you take a moment to drive past Carmel High and relish the time sitting in traffic at any given hour. Herm and I cannot speak to the environmental impact that the lights could have on the community as that is not our area of expertise, but we do know that there are stadium lights across the country and Friday Night Light experiences happen almost everywhere. High school athletics has also changed from 30 years ago. Stadium lights would give more opportunities for practices and games for our student-athletes, both male and female. Most important, let's give all our students an opportunity to support their team regardless of where they live in the school district. Coming to campus on a Saturday morning is no longer a reality for all members of the student body.

We applaud you Dr. Knight and the leadership of the Carmel School Board for listening to the concerns of the Carmel community who oppose this project. We appreciate the discussions that have happened thus far and for finding ways to make the project a reality by attempting to satisfy everyone who could potentially be affected. Thank you for doing the background work and coming up with solutions for possible pollution, environmental, and event parking issues. Above all, thank you for putting the students first. We trust in your leadership as educators, and we support you and all the work that has been done to give our students at Carmel High School the best possible high school experience.

As the great, late Vince Lombardi said, "People who work together will win, whether it be against complex football defenses, or the problems of modern society."

Warmest Regards,

Lia and Herm Edwards



## Response to Letter 17, Lia and Herm Edwards

1. The commenters express support for the proposed project, but does not comment on the RDEIR. Therefore, no response is necessary.

On Sep 11, 2022, at 11:45 PM, J KLM <[jklm403@yahoo.com](mailto:jklm403@yahoo.com)> wrote:

Dear Sarah,

1 | I was recently informed that Carmel High School is intending to install stadium lights. I really don't know how to express how upsetting this is to me. Growing up, I spent many weekends with my parents in Carmel. We would go to a fine restaurant and take a walk and look at the stars. I recently moved back here after living in Oregon for sixteen years. I was so pleased to see that Carmel still has dark skies and I can still enjoy the stars. The dark skies retain the natural and unique beauty of this entire area. I want to emphasize natural. When climate change is burning forests/neighborhoods and floods are ravaging communities, I just don't understand why you would want to increase energy usage for lights which are unnecessary and light polluting. Carmel is a magical place that needs to be preserved in every possible way so that future generations can take walks with their parents and look at the stars. I am so disappointed that these lights are even being considered. It's just not right.

Best Regards,  
Jana Lee

## Response to 18a, Jana Lee

1. The commenter expresses concern regarding light pollution associated with the proposed project. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR. Climate change, as it relates to the proposed project's greenhouse gas emissions, is addressed in Section 9.0, Greenhouse Gas Emissions. Energy use is addressed in Section 8.0, Energy. No changes to the RDEIR are needed.

From: **Jana Lee** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 5:12 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_lrzqQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_lrzqQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.



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i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
  - ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
  - iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.
- a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Jana Lee

[jklm403@yahoo.com](mailto:jklm403@yahoo.com)

47 Skyline Crest

Monterey , California 93940

## Response to Letter 18b, Jana Lee

1. See responses to Letter 2b.

On Wed, Sep 14, 2022 at 6:18 PM David Vivolo <[vivologolf@yahoo.com](mailto:vivologolf@yahoo.com)> wrote:

Hello,

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I live on Carmel Knolls Dr and this proposed project would impact my home and personal being significantly. We live in upper Carmel Knolls and live aside the Hatton Canyon. We already hear noise from the high school but have never complained. However, this project will impact our view, have noise at night, aesthetically impact us, biologically impact riparian habitat and other sensitive natural communities, conflict with state and local plans for renewable energy or energy efficiency and reducing the emissions of greenhouse gases.

Not to mention our home value would decrease.

I sent two of our children to Carmel High and have always supported the school, however, this is an incredibly bad idea to change our Carmel culture with lights that will impact the community in so many negative ways.

Sincerely,  
David Vivolo



## Response to Letter 19a, David Vivolo

1. The commenter expresses concern regarding light pollution associated with the proposed project. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR.

The commenter expresses concern regarding noise increases associated with the proposed project. Noise impacts are addressed in Section 10.0, Noise, of the RDEIR.

The commenter expresses concern regarding biological resource and habitat impacts. Biological impacts are addressed in Section 7.0, Biological Resources.

The commenter expresses concern over the project's potential conflict with state and local plans for renewable energy or energy efficiency and reducing the emissions of greenhouse gas emissions. These issues are addressed in sections 8.0, Energy, and 9.0, Greenhouse Gas Emissions, respectively, of the RDEIR.

Regarding home values, this is not an environmental issue and therefore, no response is necessary. Economic and social effects that are not related to physical impacts are not treated as effects on the environment, and need not be evaluated in an EIR. (CEQA Guidelines, §§15131(a) & 15358(b).)

From: **David Vivolo** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 7:06 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_lrzqQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_lrzqQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded



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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

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when properly compared to the CHS location:

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David Vivolo

[vivologolf@yahoo.com](mailto:vivologolf@yahoo.com)

25540 Carmel Knolls Dr

Carmel, California 93923

## Response to Letter 19b, David Vivolo

1. See responses to Letter 2b.

On Wed, Sep 14, 2022 at 8:54 PM Steven Chang <[sungyul.chang@gmail.com](mailto:sungyul.chang@gmail.com)> wrote:  
PLEASE DO NOT INSTALL THE LIGHTS AT CARMEL HIGH.

1

We live in Carmel Knolls and the thought of >5M lumens shining over our backyard is unthinkable.

It will direct affect our well being because we LIVE here behind Carmel football field. We can already hear every time there is practice, games ceremonies. Fortunately they are during normal hours. With lights this will be at a much later hour affecting our well being. Render our backyard uninviting unusable during those nights.

The light pollution will be horrible for the community. The BEAUTY and draw of Carmel is the natural beauty of the land without buildings, without stadium lights, without noise pollution.

Our kids have been fine all these years without the lights. They will continue to strive and succeed under the current model.

As taxpaying citizens of Carmel that live directly behind the high school and be affected most we VOTE NO! on stadium lights

Steve and Jiwon Chang  
25838 Carmel Knolls Dr  
Carmel, CA. 93923  
831-915-7675

## Response to Letter 20, Steve and Jiwon Chang

1. The commenter expresses concern regarding light pollution associated with the proposed project. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR.

The commenter expresses concern regarding noise associated with the proposed project. Noise impacts are addressed in Section 10.0, Noise. In determining whether an environmental impact is significant, “the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons.” (*Eureka Citizens for Responsible Gov’t v. City of Eureka* (2007) 147 Cal. App. 4th 357, 376.)

PUBLIC COMMENT



I would like to share the following comments:

1. *Whether my yard and house were flooded from rain off from Carmel High two things have happened - The asphalt to curb was installed along my yard and diverted the water down the street.*

2. *Drains were added - although above water level so I had project manager place sand bags at lower level of drain so water goes down drain.*

*But new drains' and money set aside more drains' and money set aside*  
 ★ Please give your input card to Tricia Zarevich, Administrative Assistant to Superintendent prior to leaving the meeting. *I'm getting to old to clean out drains*

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*which I've been doing for several years.*

*Belle James  
25558 Morse Dr  
Carmel 93923*



## Response to Letter 21a, Belle James

1. Comment noted. The commenter expresses concern over alleged past stormwater run-off and drainage issues at their home as a result of previous development activity at Carmel High School but does not comment on the RDEIR. Therefore, no response is necessary.

**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

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We have serious concerns regarding **your** Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



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**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where <sup>are</sup> the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - Updating required school area warning signage
  - Consider posted speed reductions down to 15 MPH in school areas
  - Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps
  - Exploring additional stop sign controls at intersection
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.



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**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each of agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Belle James Belle James

DATE: 10.4.2022

CONTACT INFORMATION: 25558 Morse Dr Carmel, Ca 93928

## Response to Letter 21b, Belle James

1. See responses to Letter 2b.

Belle James  
25558 Morse Dr  
Carmel, Ca 93923

Carmel Unified School District  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Rd.  
Carmel, Ca. 93923

Re: Stadium Lights at Carmel High School

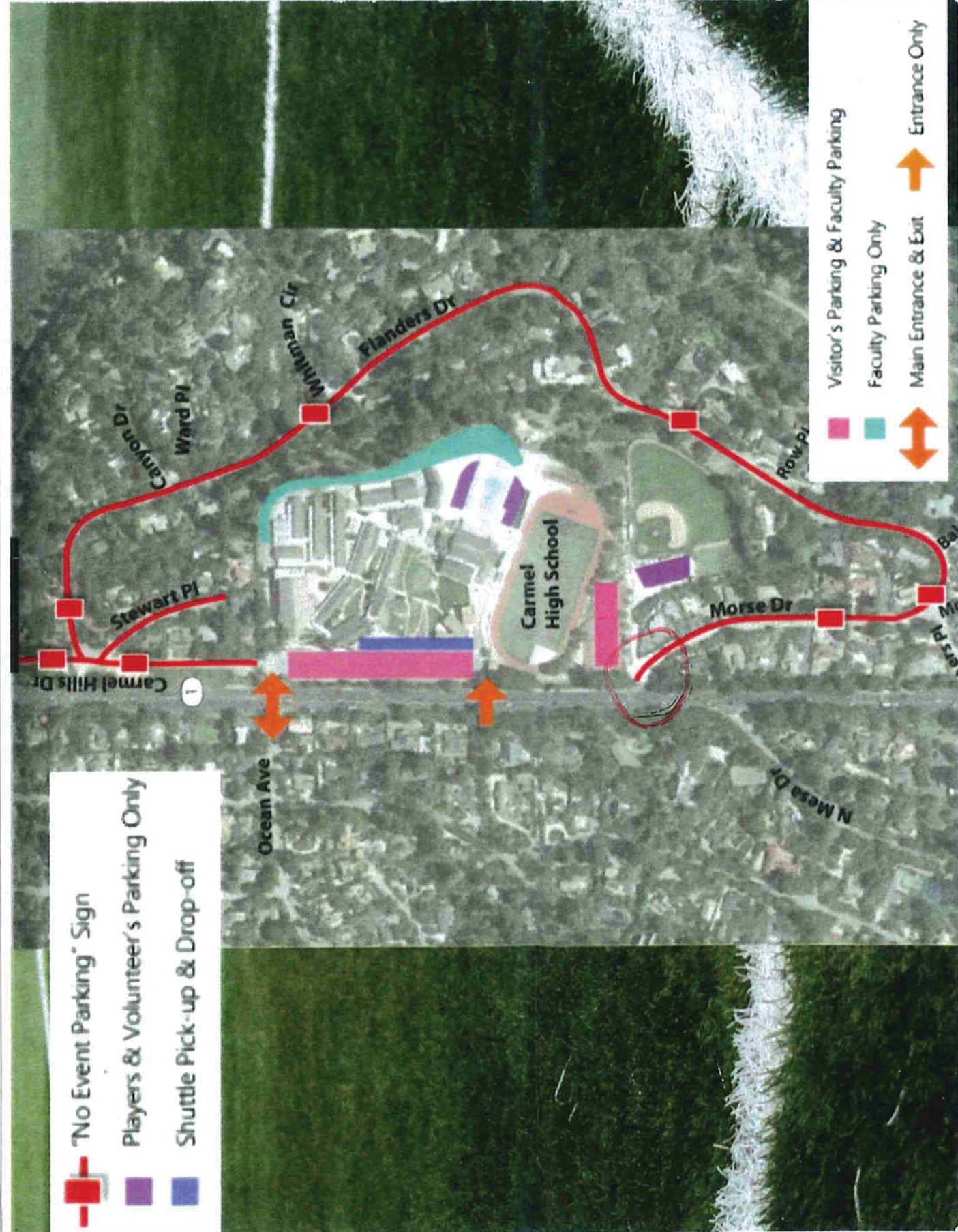
I have several concerns numbered 1 thru 10 following in no specific order:




- 1 If night lights will help school spirit Why does 't PG High beat us in football? They've had lights for years
- 2 Lights will be on eye level with Hwy 1 going south and could cause accidents
- 3 Water run off of non permeable surfaces is out lawed in the City of Carmel, my property has been flooded in the past  
You can see where I had to put in pea gravel to protect erosion. Drains were put in several years ago but above grade  
So crew put sand bags around lower drain so water pooled up and went into drain. This year I turned 80 and haven't  
Been up to raking it clear. Dr. Knight at a meeting said fellow from Carmel High would take care of it. NOT done
- 4 New drains not mentioned
- 5 Streets are narrow . Night games parking will make my street very dangerous. Have very small children living next door. I received a notice that NO EVENT PARKING signs were ~~to~~ be put up but NOT at my end of the street(closest to football field) where would you park? Please put signs up on both sides of Morse Dr just off HWY 1
- 6 School was not friendly during pandemic . Had yellow ribbons and signs up saying field was not available. I had knee surgery and really wanted ~~to~~ walk on a smooth surface. Not allowed!
- 7 Tennis courts were built with locals support and used by locals and classes. So it appears that tennis teams and classes can drive to middle school while after school football team couldn't be bothered?
- 8 Trail up from baseball field parking is too expensive to fix but not too expensive to put in lights?
- 9 Lights on swimming pool were to be modified according to Dr. Knight to see if modification helped and could be used on Football Field .NOT DONE
- 10 The pro stadium built in Santa Clara was required to put a time limit on stadium lights . If lights go up limits should be in place for duration of their existence. Perhaps one violation. Next event canceled. After 3 offences NO MORE LIGHTS for 2 years.

These are my personal concerns .

  
Sincerely , Belle James





-  "No Event Parking" Sign
-  Players & Volunteer's Parking Only
-  Shuttle Pick-up & Drop-off

-  Visitor's Parking & Faculty Parking
-  Faculty Parking Only
-  Main Entrance & Exit
-  Entrance Only

## Response to Letter 21c, Belle James

1. Comment noted. The commenter does not raise an environmental issue. Therefore, no response is necessary.
2. The commenter raises a concern about the proposed stadium light's safety impacts to drivers on State Route 1 going south. As shown in Section 4.0, Project Description, of the RDEIR (see Figures 4-2a and 4-2b), horizontal foot-candle measurements indicate that the lights would not expose direct lighting on the surface of State Route 1 going north or south. See also Section 5.0, Aesthetics, of the RDEIR for discussion of visual impacts on adjacent uses including State Route 1. See also Section 11.0, Transportation, for impact discussion of traffic safety and circulation hazards.
3. The commenter expresses concern of water run-off and other erosion concerns as a result of the proposed project. See Section 12.0, Soils, Erosion, and Water Quality, of the RDEIR for discussion of project impacts associated with water quality and other drainage related issues. Project impacts associated with soil erosion and surface water quality were determined to be less than significant with implementation of applicable statewide National Pollution Discharge Elimination System (NPDES) General Permit for Discharge of Stormwater Associated with Construction Activity (Construction General Permit). Also, for clarification the project site and surrounding neighborhoods are located in unincorporated Monterey County (not the City of Carmel-by-the-Sea). The school district is required to comply with the Post Construction Stormwater Management Requirements for Development Projects in the Central Coast Region, Central Coast Regional Water Quality Control Board (CRWQCB) Resolution No. R3-2013-0032. This requirement will be addressed by putting flow-through tree box filters in the new parking lots.
4. The commenter mentions that no new drainages are mentioned. See response to comment 3 above.
5. The commenter expresses concerns over pedestrian and circulation safety on the streets surrounding Carmel High School. The proposed project includes the addition of 111 on-site parking spaces. Circulation hazards are addressed in Section 11.0, Transportation, of the RDEIR and through implementation of the Traffic Management Plan (TMP) as outlined in mitigation measure 11-4.
6. Comment noted. Campus closures to the public during the COVID-19 pandemic are not the subject of the RDEIR. The commenter does not raise an environmental issue. Therefore, no response is necessary.

7. Comment noted. The existing schedule of high school tennis court use is set forth in Table 3-2 of the RDEIR. As set forth on this table, tennis practices currently occur at Carmel High School, however tennis matches and tournaments are played at Mission Ranch and Carmel Valley Athletic Club. The proposed tennis court schedule at Carmel Middle School with project implementation is set forth in Table 4-6 of the RDEIR. Tennis matches and tournaments will continue to be held off-site at Mission Ranch and Carmel Valley Athletic Club. An existing compared to proposed analysis is set forth starting on page 4-36 of the RDEIR. The commenter does not raise an environmental issue. Therefore, no response is necessary.
8. The commenter comments that the stairs from the baseball field are not proposed to be fixed. This is correct. The stairs are not part of the proposed project, and therefore are not the subject of the RDEIR. However, regarding pedestrian access from the baseball parking lot, as shown in Figure 4-1 in Section 4.0, Project Description, of the RDEIR, a new four-foot sidewalk is planned to connect the existing baseball parking lot with the proposed tennis court parking lot off Morse Drive.
9. The commenter questions whether the existing pool lights will be replaced. See Section 4.0, Project Description, for a discussion of replacement of existing pool light fixtures (see page 4-22).
10. The commenter expresses a desire to see limitations on light duration. Limitations on the proposed stadium lights are addressed through Mitigation Measure 5-2a in Section 5.0, Aesthetics, in the RDEIR.



intentionally infected the student population against the residents. We are all the same community, the students are our children's grand children they are our reason for living in this remarkable environment. Don't be de visible and try to divide us. We believe that dark/night sky is an asset that should not be compromised with 80' stadium high power lights. This is unacceptable. Thank you for your consideration.

JANE GOLDMAN 93923

1  
con't.

PUBLIC COMMENT



I would like to share the following comments: 8/14/22  
RDEIR!

Lighting - I think it is very important to stay with Saturday play, and not erect 80' stadium lights. Use the traditionally daylight and Saturday to bring families together, children, moms & dads & grandparents. This is school spirit at its finest. This will be forever lost if Friday night lights take over. I feel the Superintendent & Principal have

★ Please give your input card to Tricia Zarevich, Administrative Assistant to Superintendent prior to leaving the meeting.

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## Response to Letter 22a, Jane Goldcamp

1. This comment expresses opposition to the project and expresses a desire to see the school district maintain Saturday football games only and not construct new stadium lights. Light impacts as a result of the proposed project are addressed in Section 5.0, Aesthetics, of the RDEIR.

From: **Jane Goldcamp** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Thu, Oct 6, 2022 at 7:18 AM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

Public Comment on RDEIR for CHS Stadium Lights 10/06/2022

To CUSD School Board Trustees:

Sara Hinds

Karl Pallastrini

Tess Arthur

Anne Marie Rosen

Seaberry Nachbar

Superintendent Ted Knight Submitted on [savecarmel.org](http://savecarmel.org) 7:18am

1

My comments are based on my own assessment of the RDEIR.

They are unique and are not duplicates of potentially similar comments submitted by other concerned citizens.

Please evaluate them and respond to them independently in the final environmental impact report.

Please acknowledge receipt of this message.

I have serious concerns regarding your Environmental Impact Report.

You are required to respond.

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:



1  
con't.

Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.

#### Flaws in the Objectives -

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Jane Goldcamp

Jane Goldcamp

[jane@mntntools.com](mailto:jane@mntntools.com)

PO Box 22788

Carmel, Saint Croix Island 93922-0788

## Response to Letter 22b, Jane Goldcamp

1. See response to comment 1 from Letter 2b.

From: **Jane Goldcamp** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Thu, Oct 6, 2022 at 7:31 AM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

Public Comment on RDEIR for CHS Stadium Lights 10/06/2022

To CUSD Trustees;

Sara Hinds, Karl Pallastrini, Tess Arthur, Anne Marie Rosen,  
Seaberry Nachbar and Superintendent Ted Knight:

Submitted on [savecarmel.org](http://savecarmel.org) 7:31 am

1

My comments are based on my own assessment of the RDEIR.

They are unique and are not duplicates of potentially similar comments submitted by other concerned citizens.

Please evaluate them and respond to them independently in the final environmental impact report.

Please acknowledge receipt of this message.

I have serious concerns regarding your Environmental Impact Report.

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here.

1  
con't.

The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.

Flaws in the Impact of the Lights -

The RDEIR is correct to assess that the lights will have a “Significant and Unavoidable” impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqqyKOWRp60fDM\\_IrZgQMFtarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqyKOWRp60fDM_IrZgQMFtarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr:

<https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pIL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start,

i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty.

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con't.

At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

All of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project.

I strongly oppose allowing this project to move forward.

Jane Goldcamp

Jane Goldcamp

[jane@mntntools.com](mailto:jane@mntntools.com)

PO Box 22788

Carmel, Saint Croix Island 93922-0788

## Response to Letter 22c, Jane Goldcamp

1. The comment is repetitive of comments previously stated by the commenter in Letter 22b.  
See response to comment 2 from Letter 2b.



From: **Jane Goldcamp** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Thu, Oct 6, 2022 at 7:46 AM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

Public Comment on RDEIR for CHS Stadium Lights 10/06/2022

To CUSD Trustees;

Sara Hinds

Karl Pallastrini

Tess Arthur

Anne Marie Rosen

Seaberry Nachbar

Superintendent Ted Knight Submitted on [savecarmel.org](http://savecarmel.org) 7:45am

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My comments are based on my own assessment of the RDEIR.

They are unique and are not duplicates of potentially similar comments submitted by other concerned citizens. Please evaluate them and respond to them independently in the final environmental impact report. Please acknowledge receipt of this message.

I have serious concerns regarding your Environmental Impact Report.

You are required to respond.

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here.

The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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con't.

#### Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

iv. Turn down the Public Address System's volume, it is unnecessarily loud.

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con't.

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Ensure overflow parking does not shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

Where is the financial budget detailing the expense of the new Stadium Improvements Plan RDEIR? I can find no mention of any costs associated with this development. Who are the Contractors that have bid on this project? Why are you hiding this information from your constituents? Please respond to these questions with a detailed accounting and list of approved contractors for your project.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project. I strongly oppose allowing this project to move forward.

Jane Goldcamp

[jane@mtntools.com](mailto:jane@mtntools.com)

PO Box 22788

Carmel, Saint Croix Island 93922-0788

## Response to Letter 22d, Jane Goldcamp

1. See response to comment 3 from Letter 2b.

From: **Jane Goldcamp** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>

Date: Thu, Oct 6, 2022 at 8:12 AM

Subject: Public Comment on RDEIR for CHS Stadium

Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

Public Comment on RDEIR for CHS Stadium Lights 10/06/2022

To CUSD School Board Trustees:

Sara Hinds

Karl Pallastrini

Tess Arthur

Anne Marie Rosen

Seaberry Nachbar

Superintendent Ted Knight Submitted on [savecarmel.org](http://savecarmel.org) 8:12 am

1 | My comments are based on my own assessment of the RDEIR.

They are unique and are not duplicates of potentially similar comments submitted by other concerned citizens. Please evaluate them and respond to them independently in the final environmental impact report. Please acknowledge receipt of this message.

I have serious concerns regarding your Environmental Impact Report.

You are required to respond.

1  
con't.

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized below.

Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.

The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

#### Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>



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con't.

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGastHtwltAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*).

Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

Where is the financial budget detailing the expense of the new Stadium Improvements Plan RDEIR? I can find no mention of any costs associated with this development. Who are the Contractors that have bid on this project? Why are you hiding this information from your constituents? Please respond to these questions with a detailed accounting and list of approved contractors for your project.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project.

I strongly oppose allowing this project to move forward.

Jane Goldcamp

Jane Goldcamp

[jane@mntntools.com](mailto:jane@mntntools.com)

PO Box 22788

Carmel, Saint Croix Island 93922-0788

## Response to Letter 22e, Jane Goldcamp

1. See response to comment 4 from Letter 2b, and response to comment 16, Letter 11b.

From: **Jane Goldcamp** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Thu, Oct 6, 2022 at 8:33 AM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

Public Comment on RDEIR for CHS Stadium Lights 10/06/2022

To CUSD Trustees;

Sara Hinds

Karl Pallastrini

Tess Arthur

Anne Marie Rosen

Seaberry Nachbar

Superintendent Ted Knight Submitted on [savecarmel.org](http://savecarmel.org) 8:33am

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They are unique and are not duplicates of potentially similar comments submitted by other  
concerned citizens. Please evaluate them and respond to them independently in the final  
environmental impact report. Please acknowledge receipt of this message.

I have serious concerns regarding your Environmental Impact Report.  
You are required to respond.

I am submitting the following comments on the Revised Draft EIR titled  
"Carmel High School Stadium Improvements".

1  
con't.

I disagree strongly with many aspects of the RDEIR, which are summarized here.

Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

#### Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37lwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 "would cost upwards of \$72 million dollars" (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of

1  
con't.

leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

D. Where is the financial budget detailing the expense of the new Stadium Improvements Plan RDEIR? I can find no mention of any costs associated with this development. Who are the Contractors that have bid on this project? Why are you hiding this information from your constituents? Please respond to these questions with a detailed accounting and list of approved contractors for your project.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project. I strongly oppose allowing this project to move forward.

Jane Goldcamp

Jane Goldcamp

[jane@mtntools.com](mailto:jane@mtntools.com)

PO Box 22788

Carmel, Saint Croix Island 93922-0788

## Response to Letter 22f, Jane Goldcamp

1. See response to comment 5 from Letter 2b.



From: **Jane Goldcamp** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Thu, Oct 6, 2022 at 10:29 AM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

Public Comment on RDEIR for CHS Stadium Lights 10/06/2022

To CUSD School Board Trustees:

Sara Hinds

Karl Pallastrini

Tess Arthur

Anne Marie Rosen

Seaberry Nachbar

Superintendent Ted Knight Submitted on [savecarmel.org](http://savecarmel.org) 10:30am

1

My comments are based on my own assessment of the RDEIR.

They are unique and are not duplicates of potentially similar comments submitted by other concerned citizens. Please evaluate them and respond to them independently in the final environmental impact report. Please acknowledge receipt of this message.

I have serious concerns regarding your Environmental Impact Report.

You are required to respond.

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

1  
con't.

I disagree strongly with many aspects of the RDEIR, which are summarized here.

Light Pollution:

On Page 104 RDIER provides: Table 4-3 Proposed Stadium and Pool Facility Lighting Schedule

There are significant overlaps when the stadium and pool lights will be on together, yet RDEIR provides no cumulative impacts of the combination of the light pollution when both lights are on.

Problem- All of Appendix C has to be re-done when both facility lights are on. This should include light spills, glow, spread and cumulative light from parking lot and sidewalk lighting.

Question: Why is the RDEIR deliberately vague in the total number of overlapping evenings and the combined environmental impact? This seems to be purposely underestimated.

Solution: stay the course with Saturday afternoon games, which save vast amounts of energy and money, plus it's a beautiful Saturday in the neighborhood to gather with friends and families at CHS. Evenings are likely to be very cold, foggy, and windy which will likely reduce the spectator participation.

2

Scenic Highway 1:

Proximity of CHS is close to Scenic Highway 1 Protected by the Corridor Program.

Request: Visual Impact Assessment (VIA) and Scenic Resource Evaluation (SRE). These studies are used to predict the degree and type of impact proposed projects will have on the "visual" environment.

New scopes of work in 4.2 Project Characters 18-foot drive aisle and new parking lot with 12 foot lights (replacing tennis courts) require specific distance measurement to Scenic Highway 1 and Visual Impact Assessments as both will impact Corridor Program Guidelines.

In addition, Property Light Spill on page 10, Appendix C shows limited impact area including not addressing the gap on Scenic Highway 1 where light spill is at its highest point. Expand the spill property spill coverage at all elevation points so we understand where all points reach zero (this should be done with the combination of stadium lights AND pool lights).

3

Problem: The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts. It be granted for this project to circumvent these rules.

Question: Why is CUSD ignoring the constructive feedback from the negatively impacted residents, as well as, disallowing community participation that could benefit all concerned

3  
con't.

parties?

Solution: Abandon this "Improvement Plan", these are not improvements. Do not install Stadium lights that are decidedly detrimental to the entire residential community surrounding CHS.

4

Problem: Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

Solution: Stay the course, continue with Saturday afternoon football games. It is wrong to have hundreds of evenings light up and impacted by games and/or practices. It is inconsiderate and intolerable for the surrounding residential neighborhoods that for decades have enjoyed peaceful dark/night skies as the norm, to be so negatively impacted.

Problem: The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

- Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

- Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqqyKOWRp60fDM\\_IrZgQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqyKOWRp60fDM_IrZgQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

Solution: Consider that Saturday games are the best alternation for students and spectators.

5

Problem: The RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is a Significant Impact almost every single day of the school year.

At minimum the following additional mitigations are critical to preserving the scenic vistas and visual character of Carmel.

Question: Why does the CUSD and the RDEIR ignore stated, unmitigateable Significant Impacts on the surrounding community?

Solution: Disallow lights usage on weekends for any use, period.

Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying "the Illuminating Society of Engineers does not provide lighting standards for reduced

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con't.

levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

Limit Stadium and Pool light usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

Do not allow cumulative light usage Stadium and Pool lighting should be scheduled separately, the combined usage is intolerable to the surrounding residential neighborhood. Do not rent the Stadium and Pool for any weekday and weekend evenings.

Problem: The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty.

Solution: The community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future. CUSD should not be exempt from being required to communicate any changes that they may like to initiate.

6

Problem: The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact.

Solution: Instead of cutting down trees, this project should be putting up additional trees for the betterment of Carmel.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Jane Goldcamp

Jane Goldcamp

[jane@mtntools.com](mailto:jane@mtntools.com)

PO Box 22788

Carmel, Saint Croix Island 93922-0788

## Response to Letter 22g, Jane Goldcamp

1. This comment is regarding the cumulative impact of both the pool facility lights and the proposed stadium lights being on at the same time. Section 5.0, Aesthetics, addresses the cumulative visual impacts of the pool facility lights, the proposed stadium lights, and the proposed new parking lot lights. The nighttime visual simulations include all three. Appendix C includes data regarding the pool lights and stadium lights individually and cumulatively. No changes to the RDEIR are required.
2. This comment is about the visual impacts from State Route 1 and the commenter includes text/discussion from Caltrans guidance for Visual Impact Assessment (VIA) for Projects on State Highway System (<https://dot.ca.gov/programs/design/lap-visual-impact-assessment>). Although the project can be seen from the State highway, the project is not on the State highway system; therefore, Caltrans guidance for visual impact assessments is not required. See also response to comment 1, Letter 14-3-w. The RDEIR evaluates the proposed project's visual impacts from State Route 1, as well as from several other locations. It should be noted that no light spill will occur beyond the school's boundary and therefore, will not spill on State Route 1. The lights will be visible from State Route 1. See Section 5.0, Aesthetics, for the visual impact analysis. No changes to the RDEIR are required.
3. Regarding the number of games played, see response to Letter 14-4-m, comment 6. The commenter also states that a cost-benefit analysis is required in order for the school district to adopt a Statement of Overriding Considerations. See responses to comment 2 in Letter 2b and 14-2-w-, comment 4 for further discussion. No changes to the RDEIR are required.
4. This comment is regarding the visual assessment of the lights and atmospheric moisture.  
  
See discussion of "Visual Assessment of Lights" under response to comment 2 in Letter 2b. No changes to the RDEIR are required.  
  
See discussion of "Atmospheric Conditions" under response to comment 2 in Letter 2b. No changes to the RDEIR are required.
5. The commenter expresses concern that the stadium lights will be on practically every day of the school year. See discussion of "Number of Days Lights Would be on for Games and Practices" under response to comment 2 in Letter 2b. See Section 3.0, Changes to the RDEIR, in this Final EIR for a edit made to the number of games listed in a mitigation measure (5-2a) due a adding error.
6. The commenter suggests planting trees to assist with mitigating the lighting impacts identified in the RDEIR. See discussion of "Planting Trees as Mitigation Measures" under response to comment 2 in Letter 2b. Other than the addition of the new mitigation measure outlined in that discussion in Letter 2b, no changes to the RDEIR are required to address this comment.

On Thu, Sep 15, 2022 at 2:34 PM Pat Rosburg <[patrosburg@yahoo.com](mailto:patrosburg@yahoo.com)> wrote:

1 | I am totally opposed to stadium lights and do not understand why this is being pursued when there is opposition in the community.

| Patricia Rosburg



## Response to Letter 23, Patricia Rosburg

1. Comment noted. The commenter expresses their opposition to the stadium lights. The comment does not raise an environmental issue and therefore, no response is necessary.

On Thu, Sep 15, 2022 at 8:37 PM Richard Dauphine <[richard.dauphine@gmail.com](mailto:richard.dauphine@gmail.com)> wrote:

I live across from the CHS and my children have gone to Carmel Unified Schools.

**I am in favor of letting the CHS stadium have lights, increased parking and an improved play place for the students at the school.**

**It is a healthy thing for the students and the sports program.**

**We should do all we can to support education, recreation and the school.**

Richard Dauphine, MD

## Response to Letter 24, Richard Dauphine, MD

1. Comment noted. The commenter expresses their support for the proposed project but does not raise an environmental issue. Therefore, no response is required.

On Fri, Sep 16, 2022 at 3:32 PM Mary SURBRIDGE <[maryesurbridge@gmail.com](mailto:maryesurbridge@gmail.com)> wrote:

Dear CUSD,

I had intended to stay out of the debate about the CHS Stadium lights after calling the Superintendent's office in Spring, 2022. At that time I stated that a small but vocal group of neighbors in Carmel Views and specifically on Pine Hills Drive were making announcements representing the entire neighborhood. I wanted the Superintendent to know that we live in Carmel Views and ***we are proponents of the Stadium Improvements.***

Now we are receiving unsolicited flyers in our mailbox that provide directions on how to take action and contact the School Board. So I am. Please know that we see the Stadium Improvements as a ***benefit to the entire community,*** especially the students. We are grateful for your efforts on behalf of the students and your dedication to CUSD.

Mary Egan Surbridge  
Thomas Surbridge  
24960 Pine Hills Drive  
831-624-4497

## Response to Letter 25, Mary and Thomas Surbridge

1. The commenters express their support for the proposed project but do not raise an environmental issue. Therefore, no response is required.

1 NO LIGHTS !

I have lived in Carmel for the last five years and the last thing I would want to see are football stadium lights polluting the environment. Play the games during weekend daylight hours and save everyone energy, money and a way of life natural to this area. This is another ludicrous issue that would be impacting the environment and population in a substantially negative manner.

I certainly hope there are enough caring individuals who will come together and help prevent this obtrusive and wasteful event from ever manifesting.

Thank You.

Sincerely,

James Lagiss  
Pine Hills Drive Resident



## Response to Letter 26, James Lagiss

1. The commenter expresses their opposition to the stadium lights and raises concern over potential project impacts associated with the stadium lights and energy. Lighting impacts associated with the proposed project is addressed in Section 5.0, Aesthetics, of the RDEIR. Energy impacts associated with the proposed project is addressed in Section 8.0, Energy, of the RDEIR.

9/19/22

## No to lights etc.

- 1 - traffic problem & congestion of same in the area - more vehicle
- 2 - noise
- 3 - disturbing wildlife - no more bobcats passing thru & deer
- 4 - Influx of people who previously not aware of the area: just a few years ago kids were openly consuming drugs before & after school, even a tent hidden in the bushes at the mouth of the canyon. A "bong" device used for smoking tobacco, cannabis - empty liquor bottle was brought to a meeting of concerned neighbors - drug sales were going on ... found in bushes
- Dog walkers in the neighborhood do not make a good match with speedy drivers

etc. etc. For Ocean Ave:

Focus on the arts - instead of commercial banners have students create banners for holidays & special events w/ concerts, dances from concerned neighbors

## Response to Letter 27, Concerned Neighbor

1. Comment noted. The commenter addresses concerns of existing traffic and congestion in the area surrounding the high school. Traffic impacts and proposed mitigation measures are addressed in Section 11.0, Transportation and Parking.
2. Comment noted. The commenter notes the increase of traffic and congestion leading to more vehicle noise as a result of the proposed project. Traffic noise impacts are addressed in Section 10.0, Noise, of the RDEIR.
3. Comment noted. The commenter addresses the possible disturbance of wildfire as a result of the proposed project. In particular, the commenter notes their concern for bobcats and deer which pass through the area. Impacts on sensitive biological resources are addressed in Section 7.0, Biological Resources, of the RDEIR. However, bobcats and deer are not specifically addressed in the RDEIR as they are not identified by state or federal agencies as special-status species, as required by CEQA.
4. Comment noted. The commenter addresses their concern for illicit/illegal activities by students in the neighborhoods near the high school and in Hatton Canyon. Alleged past incidents of juvenile drug consumption, drug sales, and drug paraphernalia are not the subject of the RDEIR and are outside the scope of CEQA. The comment also raises concern for dog walkers and speedy drivers, which is likewise not the subject of the RDEIR. This comment does not raise an environmental issue and therefore, no response is necessary.
5. Comment noted. The commenter notes their desire to see more banners along Ocean Avenue that advertise arts-related events at the high school. Ocean Avenue banners are not part of the proposed project, and are not addressed in the RDEIR. This comment does not raise an environmental issue and therefore, no response is necessary.

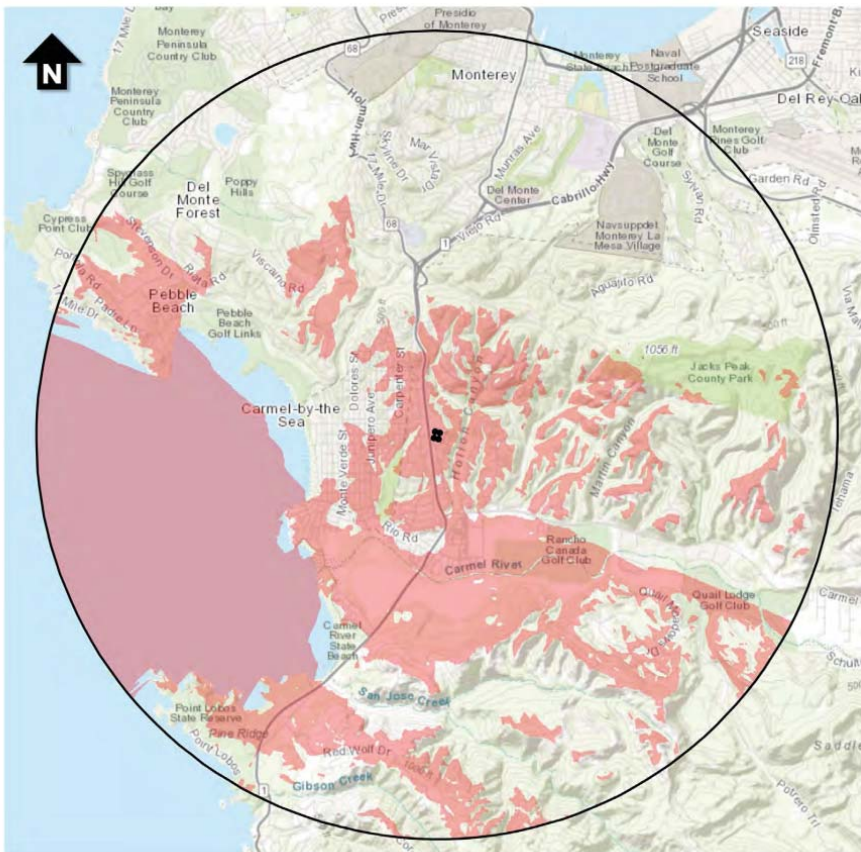
September 18, 2022

TO: Carmel School Board and Administration RE: Stadium Light Project and EIR

1 Thank you for doing a more thorough EIR for the proposed Stadium Light Project. The new EIR shows clearly that the Carmel High School campus is too small, too close to town and nearby neighborhoods, too close to the scenic corridor of Hwy 1, with ingress and egress onto Hwy 1 that are too limited to accommodate the stadium lights and traffic described in the school districts proposed improvements at the High School. The fact that the high school is located on top of a hill only makes all of the potential light pollution impact worse. In addition there is a serious question as to the educational value of the new late start law especially in such a large district with the high school at the very north east end of it. These limitations and concerns should cause the school administration, school board and the community to find other solutions to satisfy the need for high school sports activities. **School spirit doesn't come from 6 nighttime football games a year but from embracing the environmental ethos of our time (to take on the climate crisis and save the planet) and embracing the special qualities of our community (preserving the dark nights).**

2 New Stadium Lights

Map of the extent of the light pollution (only covers the first 3.5 miles)



**VISIBILITY LEGEND:**

- STADIUM LIGHTS
- LIMIT OF ANALYSIS (3.5 MILE RADIUS)
- AREAS WHERE STADIUM LIGHTS MAY BE VISIBLE



2  
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This is the map from the EIR of the extent of the impact of the stadium lights on our community, it only extends 3.5 miles and obviously there would be an impact much further down into Carmel Valley. Combine this with the amount of days and hours the stadium lights will be in use, according to the EIR the lights will be turned on not only for the 44 games days but for an additional 103 practice days for a total of 147 days of the year starting in August and extending to May, the amount of time the stadium lights will be on is at least 281 hours over these 147 days, this doesn't include the dramatic increase in days and hours of use of the pool lights as well. This map and impact and the days and hours the impact will be felt should cause any responsible school board member, administrator, student or community member to reject this solution in no uncertain terms. In addition the EIR should not mention the practices only as an insignificant addition to the 44 games, the **EIR should address the impact of the 103 practice days directly and honestly present their conclusions to the community.**

Month (Number of Days with Lights in Use)	Start Time (Range)	End Time
<b>Stadium</b>		
August (3 days)	7:08 P.M. – 7:11 P.M.	8:00 P.M.
September (21 days)	6:23 P.M. – 7:07 P.M.	8:00 P.M. (10:00 P.M. for two Friday night football games)
October (16 days)	5:42 P.M. – 6:18 P.M.	8:00 P.M. (10:00 P.M. for one Friday night football game)
November (16 days)	4:21 P.M. – 5:40 P.M.	7:30 P.M. (10:00 P.M. for one Friday night football game)
December (17 days)	4:20 P.M. – 4:25 P.M.	7:30 P.M.
January (16 days)	4:38 P.M. – 5:01 P.M.	7:30 P.M. (8:00 P.M. on January 30-31)
February (15 days)	5:02 P.M. – 5:30 P.M.	8:00 P.M.
March (23 days)	5:31 P.M. – 6:59 P.M.	8:00 P.M.
April (15 days)	7:01 P.M. – 7:23 P.M.	8:00 P.M.
May (5 days)	7:26 P.M. – 7:29 P.M.	8:00 P.M.

3

**Goals**

Many of the goals described in the EIR need to be reexamined

1. Enhanced Learning – It is questionable if this is actually a goal, having Friday night football games instead of Saturday daytime football games does not enhance learning.

4

2. Late Start Law – It is questionable whether late starts will actually improve the quality of student learning or experience. Having parents who work at 8am also drop their kids off at the same time is a hardship. Having students after school programs both sports and other activities run until 8pm makes it impossible to have family dinners together and requires that students are picked up after dark much of the school year. Because CSUD is so large and the high school

4  
con't.

is at the north east corner it requires many parents and students commute long distances late at night which is more dangerous. Late practice makes it more difficult to get homework done in time to get a good night's sleep and thus defeats the whole purpose of the late start law.

5

5. Operate an athletic stadium facility that is equal to other schools. – It is questionable whether this goal is desirable any longer. Since the climate crisis is upon us it does not make sense to add all the 147 additional days of the excessive energy use of the new stadium lights as well as the additional lighting for the pool and all the new parking and driveways. This is not 1990 and the new standard for high school development in 2022 should be net zero energy use not huge increases. The school board could make the high school a model of no light sports events and net zero energy that both the students and community could be proud of.

6

8. Implement green building practices. – This is a good goal but nothing about the present development plan is doing this. The dramatic increase in energy use for stadium lights, the increase in use of pool lights and the new parking lights as well as paving over so much open land on the campus and threatening the mature Monterey pine and cypress. The result of the present plan is the opposite of green building practice. Night Sky certification will not stop the devastating effects of the 147 days of stadium light use on our community and the environment. Because the high school is on a hill above much of the community there will be no dark sky on those 147 days.

7

11. Create new healthy weekend social opportunity. – Having 6 Friday night games instead of 6 Saturday day games does not create any new social opportunities it just shifts existing ones to another time. Carmel High already has school spirit as one of the top public high schools in the state. There is no evidence that having the same number of football games on Friday night instead of Saturday afternoon would increase school spirit. The High School would be better served spending the resources on academics as a way to increase school spirit. It seems that this is mostly for the coaches and sports boosters, not the students.

8

13. Achieving the objectives of the 2019 masterplan would involve shifting the high school sports events to the new middle school sports complex. Any development at the high school does not meet this goal.

9

#### **Expanded parking at the High School**

The potential for the death and removal of mature trees that will be caused by the installation of the additional on campus parking places is a serious danger. The EIR states that there are no plans for tree removal, but even without any plans for removal, paving over the root systems of mature Monterey Cypress along Hwy 1 in front of the stadium and mature Monterey Pine in the back of the campus will endanger the life of these trees which at present provide a visual buffer to the community from the existing pool lights and any future stadium lights. Replacing the mature trees with new trees if they die or need removal is no solution because the new trees won't grow to the same size for 30 years or more. The addition of these new parking areas and driveways will only increase the future effects of the stadium and pool lighting on the



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community. Having an arborist present during construction is important but having one involved in the design of the parking and drives is much more important. It doesn't appear that any consideration has been given to protecting the trees in the proposed new parking scheme. The new on-campus parking should be eliminated from the project and all parking should occur in the exiting spaces and at the middle school with shuttles to the football games. The fact that the EIR states that the parking at the middle school is a recommendation instead of a requirement only means that it is unlikely to be used. It needs, at the very least, be a requirement that all Carmel fans park at the middle school. **The EIR should honestly address the impact of the removal of all these threatened trees and not just say none are planned for removal at this time**

10

### Alternatives

The whole development plan described in the EIR is not solving a problem but rather it is creating a problem that doesn't need to exist if more forethought had been put into the design process.

**Alternative 1 is obviously the most environmentally sound, common sense, community friendly solution, and since it has been working well for years makes sense to keep with whatever improvements the district can make.**

All the alternatives are preferable to the proposed development especially if the EIR reexamines the value of the goals they are trying to meet.

11

### Conclusion

The EIR states that the impact of the new stadium lights would be "significant and unavoidable". This includes the 147 days with the new stadium lights on, the dramatic increase in the use of the pool lights, the threat to the family life of the students of late nights at school, the dangers of driving so much more at night, the potential for killing so many of the mature trees that make the CHS campus what it is and the limitations due to the siting and access to the high school. There is not any compelling evidence that the proposed stadium lights are better than the alternatives presented in the EIR and that a "statement of overriding consideration" explaining that the project and its objectives are more important than the negative environmental impacts is not an appropriate response to this project. **The fact of the "significant and unavoidable" impacts should be enough to cause the school board, school administration, students and community to reject the present plan in no uncertain terms and find another solution that is more environmentally intelligent and community friendly and that will better serve the CHS students and families in the future.**

Sincerely

Thomas Cowen

## Response to Letter 28a, Thomas Cowen

1. Comment noted. This comment presents a summary of issues and topics to be addressed throughout the rest of the comment letter and other general comments about the proposed project. Environmental issues raised in the comment letter are addressed below as presented in the comment letter. No further response to this comment is necessary.
2. Regarding the extent of impact of the stadium lights, see response comment 2 of Letter 2b (under “Visual Assessment of Lights”).

The commenter questions the total number of games and practice days at both the stadium and pool as shown in Table 4-3, Proposed Stadium and Pool Facility Lighting Schedule, of the RDEIR. The number of anticipated practices and games presented in Table 4-3 as also presented by the commenter. The RDEIR evaluated the lighting impacts associated with the proposed project in Section 5.0, Aesthetics, which includes both games and practices. See also response to comment 2 (under “Number of Days Lights Would be on for Games and Practices”) of Letter 2b. Regarding the comment “the dramatic increase in days and hours of use of the pool lights,” the proposed project does include a retrofit of the pool lights to reduce the existing pool lighting impacts, but does not result in an increase in the use of the pool at night. Additionally, because outside groups are currently allowed to rent the pool at night, with implementation of Mitigation Measure 5-2b, which would restrict use of the facility at night by non-school related groups, this existing impact would be reduced. No changes to the RDEIR are required.

3. Comment noted. The comment is about enhanced learning, which is one of the goals of the overall proposed project rather than a component of the project. This comment does not raise an environmental issue. Therefore, no response is necessary.
4. Comment noted. The commenter questions whether late start will improve the quality of student learning or experience. It does not raise an environmental issue. Therefore, no response is necessary.
5. The commenter raises questions about how much energy generation would occur as part of the proposed project. Energy consumption is addressed in Section 8.0, Energy, of the RDEIR, and Section 3.0, Changes to the Revised Draft EIR, in this final EIR. No changes to the RDEIR are required.
6. The commenter questions whether the project would increase energy use, require tree removal, and result in impacts to the night sky. Energy use is addressed in Section 8.0, Energy, of the RDEIR. As set forth therein, new demand as a result of the proposed stadium lights and new parking lot lights would be a nominal. Likewise, the proposed project includes replacement of existing lights at the pool and along the pedestrian pathway

with more energy efficient lighting. No tree removal is planned as part of the proposed project; although the potential for tree removal as a result of the proposed project is addressed in Section 7.0, Biological Resources, of the RDEIR. Project impacts associated with light pollution and impacts to the night sky are addressed in Section 5.0, Aesthetics, of the RDEIR. No changes to the RDEIR are required.

7. The commenter questions whether moving games from Saturday afternoon to Friday night would create new healthy weekend social opportunities. See response to Letter 2b, comment 1.
8. The commenter notes shifting high school sports events to the middle school would meet the objectives of the 2019 Facilities Master Plan. The 2019 Facilities Master Plan include stadium lighting and new parking at the high school. An alternative to construct a lighted stadium at the middle school and shift a large portion of high school sporting events to the middle school was evaluated in Section 18.0, Alternatives, of the RDEIR as Alternative 4.
9. The commenter addresses concern regarding tree removal. No tree removal is planned as part of the proposed project; although the potential for tree removal as a result of the proposed project is addressed in Section 7.0, Biological Resources, of the RDEIR. The RDEIR evaluates the potential for trees to be damaged or removed, although none are proposed for removal. The location of the trees is identified in Figure 7-1, Habitat Map. As discussed on page 7-32 of the RDEIR, although project plans do not call for the removal of any of these trees, the planned construction of a new drive aisle and parking spaces could potentially jeopardize tree health through damage to roots and paving under tree driplines, resulting in the potential need to remove the trees. Mitigation Measure 7-6 states, “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.” No changes to the RDEIR are required.
10. Comment noted. The comment expresses a preference for all of the alternatives in the RDEIR. A decision on the project’s merits will be made by the Board, who will consider all comments. No environmental issue is raised and therefore, no response is necessary.
11. Comment noted. This comment expresses opposition to the proposed project and summarizes the previous comments but does not raise a new environmental issue. Therefore, no response is necessary.

No changes to the RDEIR are required.

From: **Thom Cowen** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> Date:  
Tue, Oct 4, 2022 at 4:16 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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con't.

4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

-----

#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

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iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.



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i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Thom Cowen

[thomcowen@gmail.com](mailto:thomcowen@gmail.com)

3830 Whitman

Carmel, California 93923

## Response to 28b, Thomas Cowen

1. See responses to Letter 2b.

## COMMENTS FOR REVISED DRAFT EIR / CARMEL UNIFIED SCHOOL DISTRICT PROJECT

Thank you for your time and effort. There are some important omissions in this current report that need to be addressed:

### 1 | FREQUENCY AND DURATION OF LIGHT & NOISE

- **The report is misleading about frequency and duration of light and noise. The report skims over the impact of practice lighting by enumerating game nights while omitting a clear number of practice days, burying the specifics in a graph on section 4 page 34. It reports -- "44 game nights" "in addition to practice" -- whereas, the actual number of nights that are impacted is more accurately around 147 FROM AUGUST THROUGH MAY -- this is over 200% days more than is clearly presented to the community.**
- **We need to know an exact and accurate number for the nights when lights will negatively impact the community at large to assess the resulting impact of this duration**

### 2 | IMPACT ON ACCESS FOR ALL CHS STUDENTS

- **The report does not address the unusually large geographic range of where students who attend CHS live.**
- **It does not -- but should -- address how the changes in scheduling due to implementing these plans might impact and limit access for all students to all activities of public education in the CUSD -- especially for those who live in the out-lying areas.**

**CUSD is quite different from other districts -- like Pacific Grove, Seaside or Monterey where students live within 10-15 minutes of their High Schools. We can't expect a one-size-fits-all plan to work.**

For instance, students who live as far as Big Sur or Cachagua travel 45 minutes to 1 hour one way to CHS. This Plan makes it harder if not impossible for students in out-lying areas to attend or participate in these late night events and practice. In practical terms, by the time a student changes out of sports clothes and gets back home in the dark -- it might be 9:00-9:30 pm. Even in Carmel Valley village, when practice ends at 8 pm, students don't get home until 8:30. The roads are less safe to travel at night. When does a students and their families have dinner? do home-work or gather with the rest of the family -- especially with younger siblings who might already be in bed.

We have many friends with families in the out-lying areas. Often there are car-pools which would be disrupted. Let's say my kids excel in sports but because of not living close to town, like other students, late-start practice makes it impossible to arrange transport. **Should those kids be denied full access to after school activities?**

- **Similarly for students with after-school jobs -- how does this late-start expansion plan affect them?**
- **Would the District be vulnerable to litigation of families suing for more equal access to activities or after-school work that are being denied because of distance or income needs?**

**These late start problems would have community wide impact in terms of fairness, student access and litigation. Whether we have children currently in schools or not, the full expansion plan can impact all of us as taxpayers and citizens committed to equal access.**

**Families have already gone through so much with Covid and schooling -- let's take a step back from these large scale social experiments.** A recent report in the Guardian says no one really knows how this late start experiment will work. But for sure, most CA districts are not like CUSD --- they are compact, students aren't traveling long distance later after school, they are already in lit up areas or terrain where lights won't engulf entire communities and they aren't in communities whose codes prohibit street and commercial lights like Carmel

\*<https://www.theguardian.com/education/2022/sep/14/california-later-school-start-times-law-teens-sleep>



3

### ENERGY USE: COSTS, EFFECTS ON THE POWER GRID & FIRE FIGHTING ENERGY BLACK-OUTS

The report finds **Significant, unavoidable negative impact which cannot be mitigated -- but it does not clearly assess this impact in terms of energy use and costs.** If the District is to go ahead with the proposed significant expansion of lights, we all need more specifics:

- **Can the Late-start Mandate be reconciled with the State Mandates for energy conservation in public buildings?**
- **How much additional energy will be used (or wasted) with the proposed additional new lights and expanded use of existing pool lights?**
- **What are the additional costs for tax-payers in the District? How will these costs be covered?**
- **What is the effect of the proposed additional lighting and use on the power-grid? What is the effect during fires which can require power black-outs for safety. Fire season is now all year -- (eg last years Garrapata area fire in January -- and these additional banks of lights are set from August through May.)**
- **We all want to be doing our part for climate justice -- What kind of example is our School District providing during these times of stress and strain on our power-grid and fire-fighting resources?** The proposed very large, but unspecified increase in energy use and costs occurs during peak hours --often during dangerous fire season while the rest of the community is doing our part by not running dishwashers until after 9:00 pm.

4

### PARKING AND TRAFFIC

Though adding plans for parking on CHS property as an attempt to mitigate parking impact on neighboring streets during games, **the report does not fully assess the impact of newly proposed plans for additional parking--**

- **The report does not address the impact of any extra parking lights that might be needed as part of this parking. How many lights and where? How will these impact neighbors and overload the lighting problems proposed that already cannot be mitigated.**
- **It does not address issues of slope destabilization -- especially as large-rooted trees may not survive --- on areas which involve land-fill and previously mitigated at great expense by the CUSD.**
- **We need more information about additional lighting and visual impact of these extensive new expanded parking lots. And whether increased parking in these areas increases risk for erosion on neighbors properties below, especially with more extreme weather events in our future.**

5

### TRAFFIC & SAFETY ACCESS

Shuttles proposed at Middle School are voluntary -- many will not use. **We feel the report does not adequately address our greater concerns about ingress and egress at Highway One at Ocean and Morse especially impacting emergency services.**

6

### POOL LIGHTS

- **The report needs to address additional impact from existing pool lights if lighting hours are extended**

7

### EXPANDED PARKING & EXISTING TREES

The report says existing trees will be protected with expanded parking -- however especially during drought years it confirms they might be threatened -- and would be replanted.

- **The report needs to address how these trees are providing important light screening and slope stabilization. Replacing a 90 ft tree with a 10 ft tree does not mitigate this damage, at least for decades.**

*Thank you for attending to these comments. Respectfully, Meredith Stricker, 3830 Whitman Cir., Carmel, CA 93923*

## Response to Letter 29a, Meredith Stricker

1. The commenter addresses their concerns regarding the frequency and duration of light and noise as a result of the proposed project. Regarding frequency and duration of events at the stadium and pool, see response to comment 2 (under “Number of Days Lights Would be on for Games and Practices”) for Letter 2b. Light impacts are addressed in Section 5.0, Aesthetics, of the RDEIR. Noise impacts are addressed in Section 10.0, Noise, of the RDEIR. No changes to the RDEIR are required.
2. The commenter raises concerns about access to educational activities for all students served by the school district as a result of the proposed project. A decision on the project’s merits will be made by the Board, who will consider all comments. The comment does not raise an environmental issue and therefore, no response is necessary.
3. The commenter questions whether the RDEIR assesses the project’s impacts in terms of energy use. Energy impacts are addressed in Section 8.0, Energy, of the RDEIR, and in Section 3.0, Changes to the Revised Draft EIR, in this final EIR.

Regarding cost to tax payers, this is not an environmental issue and therefore, no response is necessary. Regarding the “expanded use of existing pool lights,” the proposed project does not include expanded use of existing pool lights. Please refer to Section 4.0, Project Description, of the RDEIR.

4. The commenter addresses their concerns regarding the impact of adding additional parking to the high school campus. Specifically, the commenter questions whether additional parking lights would create a visual impact and whether construction of new parking areas increases risk for erosion and slope destabilization. Lighting impacts, including the addition of parking lot lights at the new parking area south of the stadium, is addressed in Section 5.0, Aesthetics, of the RDEIR. New lights are not required at the new parking lot east of the pool facility as there is existing lighting in that area. Erosion associated with project grading activities can occur when soils are disturbed. Very little grading is associated with the proposed project because all improvements are located on previously developed and/or disturbed areas of the campus. Erosion associated with the proposed project is addressed in Section 12.0, Soils, Erosion, and Water Quality, of the RDEIR. No tree removal is planned as part of the proposed project; although the potential for tree removal as a result of the proposed project is addressed in Section 7.0, Biological Resources, of the RDEIR. Please refer to response to Letter 28a, comment 9.
5. The commenter raises their concerns with ingress and egress along State Route 1 at Ocean Avenue and Morse Drive, especially for emergency services. Regarding emergency access routes, ingress and egress, as well as internal circulation, for everyday or for emergencies at the high school see Figure 4-1, Overall Site Plan, and Figure 4-6, Post Development Overall

Parking Exhibit, of the RDEIR, and response to Letter 14-2-f. No changes to the RDEIR are required. With implementation of the Traffic Management Plan (Mitigation Measure 11-4), parking during the most highly attended events would not result in a significant environmental impact or emergency access issues. Regarding the safety of the intersections of State Route 1 and Morse Drive and Ocean Avenue, respectively, the commenter does not provide evidence of existing or future safety issues at this intersection. Hexagon Transportation Consultants (RDEIR Appendix J) reviewed the vicinity and on-campus access and circulation and concluded that with implementation of the Traffic Management Plan, traffic operations would work acceptably. Any perceived safety impacts would be mitigated by implementation of the Traffic Management Plan. No changes to the RDEIR are required.

6. The commenter addresses the need to address additional visual impacts as a result from existing pool lights if lighting hours are extended. The RDEIR evaluates the visual impact of retrofitting the pool lights with new LED, Dark-Sky certified pool lights. However, as noted in Section 4.0, Project Description, under “Schedule of Uses at the High School,” upon implementation of the proposed project, the school district plans to maintain the existing use schedule for the existing on-campus lighted pool facility for school district purposes. However, Mitigation Measure 5-2b provides for adoption of a Board policy that restricts use of pool lights by non-school related groups after dark. Accordingly, pool lighting hours will not be extended as stated by the comment. No changes to the RDEIR are required.
7. The commenter states the RDEIR needs to address how existing trees are providing important lighting screening and slope stabilization and that replacing existing trees with smaller trees does not provide adequate mitigation. No tree removal is planned as part of the proposed project; although the potential for tree removal as a result of the proposed project is addressed in Section 7.0, Biological Resources, of the RDEIR. Please refer to response to Letter 28a, comment 9. See also response to comment 2 (under “Planting Trees as Mitigation Measures”) for Letter 2b. No changes to the RDEIR are required.

From: **meredith stricker** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>

Date: Tue, Oct 4, 2022 at 4:09 PM

Subject: Public Comment on RDEIR for CHS Stadium

Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.

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B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

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con't.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

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B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

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i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

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i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

meredith stricker

[visualpoetrystudios@gmail.com](mailto:visualpoetrystudios@gmail.com)

3830 whitman

carmel, California 93923

## Response to Letter 29b, Meredith Stricker

1. See responses to Letter 2b.

On Sat, Sep 24, 2022 at 12:56 PM Ziona Goren <[ziona.goren@gmail.com](mailto:ziona.goren@gmail.com)> wrote:

Hello school board,

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I love this district, I loved raising my kids here, and I am proud of where I live and what this school district has provided for my family and my children's education. I am voicing my opinion through this formal means that these stadium improvements, specifically adding lights, are unwanted, unwarranted, unjust, and unnecessary. It's not lost on me that expanding access to the field into the evening will provide more opportunities for student development and engagement; however, the over arching costs of these significant impacts as documented in the EIR makes this choice crystal clear. To permanently damage an environmentally sensitive and desirable area for the aforementioned benefits is completely short sided. At this time and in THIS area, where we are formally fostering environmental values from an early age, to proceed with this construction is inconsistent with the established and respected mission of the Carmel Unified School District.

Thank you for taking the time to consider my opinion. Whatever choice ultimately is made, the outcome will be here way beyond our lifetimes.

Respectfully submitted,  
Ziona Goren  
Neighbor, mother, stakeholder



## Response to Letter 30, Ziona Goren

1. Comment noted. The commenter expresses their general concerns about the proposed project and potential environmental impacts, specifically lights. Lighting impacts are addressed in Section 5.0, Aesthetics. No other environmental issues are raised and therefore, no additional response is necessary.

On Mon, Sep 26, 2022 at 7:39 AM Devie Driscoll <[ddriscoll@netpipe.com](mailto:ddriscoll@netpipe.com)> wrote:

1 | We are writing to vote NO on installing stadium lights, removing tennis courts, building of a stadium because it would bring outside Carmel events and create parking nightmares, not to mention noise and light pollution. I've lived in Carmel for 38 years, raised 3 children who attended Carmel Unified. I was a substitute teacher for Carmel Unified. I love my neighborhood, my neighbors and oppose this improvement.

Devie Tipton

Ron Tipton

William Tipton

## Response to Letter 31, Devie, Ron & William Tipton

1. The commenters note their opposition to the proposed project and their concerns regarding light pollution, parking, and noise. Regarding light pollution, see Section 5.0, Aesthetics of the RDEIR. Regarding parking, the proposed project includes the addition of 111 on-site parking spaces. Regarding noise, see Section 10.0, Noise of the RDEIR. A decision on the proposed project's merits will be made by the Board, who will consider all comments.

On Mon, Sep 26, 2022 at 5:59 PM Diane Davies <[dianecdavies@gmail.com](mailto:dianecdavies@gmail.com)> wrote:

1 | Hate the idea, it is damaging to our beautiful environment, both trees & animals (birds in particular). Traffic is already impacted everyday when school is over, now we will have MORE traffic.

Sorry this does not seem to be a great addition to our community.

NO Lights!

Diane Davies

## Response to Letter 32a, Diane Davies

1. The commenter notes their opposition to the proposed project and their concerns regarding environmental impacts associated with trees, animals, traffic, and lights. Impacts to trees and animals are addressed in Section 7.0, Biological Resources, of the RDEIR. Traffic is address in Section 11.0, Transportation and Parking, of the RDEIR. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR. A decision on the proposed project's merits will be made by the Board, who will consider all comments.

From: **Diane Davies** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> Date:  
Tue, Oct 4, 2022 at 4:50 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.



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con't.

4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_IrZgQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_IrZgQMfTarGEWSS2/view?usp=sharing)

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

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Diane Davies

[dianecdavies@gmail.com](mailto:dianecdavies@gmail.com)

8002 River Place

Carmel, California 93923



## Response to Letter 32b, Diane Davies

1. See responses to Letter 2b.

On Mon, Sep 26, 2022 at 5:06 PM Lacey Haines <[lace.haines@gmail.com](mailto:lace.haines@gmail.com)> wrote:  
 Attn: Superintendent Ted Knight

1 As a Carmel resident, and homeowner, who lives within walking distance of Carmel High School, I have serious concerns regarding your Environmental Impact Report and there are gaps and areas that need to be addressed. Please provide a factual response to each comment, question and concern listed below.

**Show the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Why the surprises? This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.
- Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Show the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!

**Figure 7-1: Habitat Map shows our beloved trees lining Scenic Highway 1 are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

- 8 **Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**
- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
  - Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
  - Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where are the Emergency Access Routes?
- 9 **You fail to identify noise during events as a significant impact despite evidence to the contrary?**
- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc
- 10 **Inspire the next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**
- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
  - CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
    - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
    - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
    - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
- 11 **Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**
- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:
  - *The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
    - *Updating required school area warning signage*
    - *Consider posted speed reductions down to 15 MPH in school areas*
    - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
    - *Exploring additional stop sign controls at intersection*
  - We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.
- 12 **Work with residents to protect their residential streets with permanent long-term No Parking Signs.**
- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
  - Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.
- 13 **Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**
- Install LED filters and use the lights as little as possible. Where is your usage policy?
  - In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.
- 14 **Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**
- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
  - Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?
- 15 **Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**
- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.
- 16 **All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**
- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
  - Specify the exact nighttime you are simulating? Show us 9 PM.
  - What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?
- 17 **Included detailed costs and budget breakdown associated with each of components of the project.**
- If one of your stated objectives is to meet school budget requirements, where are the costs estimates?
  - Please include a breakdown of all attorney fees associated with the stadium lights project.
- 18 **Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**
- Why do we only see Musco as a vendor and why is there only one design?
  - Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
  - What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

19

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
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20

**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

Thank you,  
Lacey Haines  
*Concerned Carmel Resident*

## Response to Letter 33, Lacey Haines

1. Comment noted. A decision on the proposed project's merits will be made by the Board, who will consider all comments. See response 1 to Letter 2c.
2. Comment noted. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, response to Letter 14-1-u, comment 1, and see response 9 to Letter 2c.
3. Comment noted. Past projects and their CEQA process are not the subject of the RDEIR. See response 3 to Letter 2c and response to Letter 10c, comment 3.
4. Comment noted. See response 6 to Letter 2c.
5. Comment noted. See response 8 to Letter 2c.
6. Comment noted. See response 12 to Letter 2c.
7. Comment noted. See response 10 to Letter 2c.
8. Comment noted. See response 11 to Letter 2c.
9. Comment noted. See response 7 to Letter 2c.
10. Comment noted. See response 4 to Letter 2c.
11. Comment noted. See response 13 to Letter 2c.
12. Comment noted. See responses to comment 5 to Letter 2c and comment 1 to Letter 14-1-m.
13. Comment noted. Past projects and their CEQA process are not the subject of the RDEIR. See response 15 to Letter 2c and response 3 to Letter 10c.
14. Comment noted. See response 16 to Letter 2c.
15. Comment noted. See response 18 to Letter 2c.
16. Comment noted. See response 19 to Letter 2c.
17. Comment noted. Budget is not an environmental issue and is therefore outside the scope of CEQA. See response 20 to Letter 2c and response 4 to Letter 14-2-w.
18. Comment noted. The competitive bidding process is outside the scope of the RDEIR and CEQA as it does not concern an environmental issue. See response 21 to Letter 2c.
19. Comment noted. See response 14 to Letter 2c and response 4 to Letter 14-1-g.
20. Comment noted. See response 22 to Letter 2c and response 4 to Letter 14-1-g.

On Mon, Sep 26, 2022 at 10:21 AM Patricia Guardino <[patriciaguardino@gmail.com](mailto:patriciaguardino@gmail.com)> wrote:

1

I'm writing to you in support of the stadium lights project. Carmel seems to be intent on being simply an enclave for the wealthy and old instead of being a thriving community. A community that welcomes young people and their activities instead of seeing them as a nuisance. I watched the homecoming parade and experienced a sense of community that I haven't experienced in Carmel for a long while. I would urge the board to be aware that the very vocal few (who bought houses knowing very well that there was a high school in the neighborhood) do not represent all of us in the area! It's ironic that real estate agencies sell houses touting the excellence of our schools to people who have no interest in our young people.

Sincerely,  
Patti Long



## Response to Letter 34, Patti Long

1. The commenter expresses support for the proposed project, but does not comment on the RDEIR. Therefore, no response is necessary.

On Mon, Sep 26, 2022 at 7:42 PM Janet McAthie <[jmcahie@carmelcoffeeroasters.com](mailto:jmcahie@carmelcoffeeroasters.com)> wrote:  
Attn: Dan Paul, COO

Dear Mr. Paul,

1 When we purchased our home on Morse Dr. eighteen years ago and before we had children, we were drawn to the neighborhood specifically for the proximity to the beautiful and vibrant high school. We thought it would be wonderful to be surrounded by our youth and to easily have access to the sporting events, which enrich our community.

Flash forward 18 years and we have one child who has graduated from CHS and the other is attending. We walk and ride our bikes to the various cultural and sporting events regularly and have never once been bothered by noise or traffic coming and going for sporting events. The same will remain true if lights are installed. In fact, it creates positive energy as we watch the next generation striving to reach their goals through participation in sports.

I support the lights for these reasons:

1. It allows our boys and girls equal practice time on the playing field. Girls rely on sports scholarships and we are doing them a disservice by not having equal practice time.
2. It will allow sports to be practiced later, especially in the winter months. This will be vital when our school implements a later start time, as other communities have already done.
3. CUSD must stay competitive. Many local communities have lights on their field. We are not any more special than towns such as Seaside and Pacific Grove. Stadium lights would allow CHS to host important Friday night games, with less travel expenses to other communities.
4. It will free-up teachers and staff from working on Saturdays.
5. I welcome positive change, especially when it supports young people who are experiencing record diagnoses in anxiety, depression, and a rise in suicide rates. There are very few things for High Schoolers to do because Carmel favors an aging population. Students need a safe place to congregate and show school spirit at night and the stadium lights support this need.

Thank you,

Janet

Janet McAthie  
831-521-5932 (Cell)

## Response to Letter 35, Janet McAthie

1. The commenter expresses support for the proposed project, but does not comment on the RDEIR. Therefore, no response is necessary.

On Mon, Sep 26, 2022 at 5:20 PM Dean McAthie <[dmcathie@carmelcoffeeoasters.com](mailto:dmcathie@carmelcoffeeoasters.com)> wrote:

I live 7 houses south of the high school and I'm ALL FOR the LIGHTS. I think it will be great for the kids to have enough athletic time for both the boys and girls.

For the current student body and the future classes. After all they are our future. I enjoy going to all the sport events and have no problem with the attendees or where they park. I feel grateful to be able to live here and I think the kids totally deserve to live here and have their sports activities under the lights. You have my 100% support on the lights.  
Dean McAthie, Morse Dr.

Sent from my iPhone

## Response to Letter 36, Dean McAthie

1. The commenter expresses support for the proposed project, but does not comment on the RDEIR. Therefore, no response is necessary.

On Tue, Sep 27, 2022 at 3:13 PM Margie Dally <[mkdally@icloud.com](mailto:mkdally@icloud.com)> wrote:

To Whom It May Concern:

1 | Although I do not currently have students in the district, I am all in favor of evening lighting for CUSD games. Those opposed do not have the interests or welfare of the students in mind.

Sincerely,  
Margaret Dally



## Response to Letter 37, Margaret Dally

1. The commenter expresses support for the proposed project, but does not comment on the RDEIR. Therefore, no response is necessary.

1

Please reconsider and do not start the stadium lights project.  
There are so many other projects that are more important and will increase noise and light pollution.

We want to be part of the solution, please engage us and inspire the new generation of students that are environmentally conscious!

Best regards,

Martha Douglas-Escobar

Sent from my iPhone

## Response to Letter 38, Martha Douglass-Escobar

1. The commenter expresses their opposition to the stadium lights and raises concern over potential project impacts associated with the light pollution and noise.

Lighting pollution is addressed in Section 5.0, Aesthetics, of the RDEIR. Noise impacts are addressed in Section 10.0, Noise, of the RDEIR. A decision on the proposed project's merits will be made by the Board, who will consider all comments.

On Tue, Sep 27, 2022 at 8:42 AM Pat Sanders <[pat.sanders54@outlook.com](mailto:pat.sanders54@outlook.com)> wrote:

Dear Reader,

1 | Our children/students are being taught to conserve, reuse, and recycle. It is also important to teach them not to use what they don't need to use. To refuse. Please refuse the stadium lights project. It is NOT necessary, and at this time of conservation, it is using energy which we do not need to use for a project such as this.

Think what you are teaching.

Games and activities can easily take place in daylight hours.

I am a CHS graduate.

Thank you for being thoughtful, forward thinking, and respectful of our environment.

P.A.Sanders

## Response to Letter 39, Pat Sanders

1. The commenter notes their opposition to the proposed project and their concerns regarding energy use as a result of the project. Regarding energy use, see Section 8.0, Energy, of the RDEIR, and Section 3.0, Changes to the Revised Draft EIR, in this final EIR. A decision on the proposed project's merits will be made by the Board, who will consider all comments.

On Wed, Sep 28, 2022 at 11:50 AM Michael Cate <[mcate@sbcglobal.net](mailto:mcate@sbcglobal.net)> wrote:

1 | I am strongly opposed to having lights installed at Carmel High Football field. The residential impact of night lighting, traffic and parking brings an unneeded burden to Carmel.

One can write as many environmental impact reports as one wants and still the changes are unacceptable.

The unheralded affects of night lighting, as illustrated in the town of Point Loma, should be more than enough to demand that nighttime sports lighting not be installed.

Common sense, not economics, is enough to stop this project now.

Stop the urbanization of Carmel.

Mike Cate

Carmel



## Response to Letter 40, Mike Cate

1. The commenter notes their opposition to the proposed project and their concerns regarding night lighting, traffic, and parking impacts as a result of the proposed project. Regarding lighting impacts, see Section 5.0, Aesthetics, of the RDEIR. Regarding parking, the proposed project includes the addition of 111 on-site parking spaces. Regarding traffic impacts, see Section 11.0, Transportation and Parking, of the RDEIR. Past projects in the town of Point Loma are not the subject of the RDEIR. No changes to the RDEIR are needed.

On Wed, Sep 28, 2022 at 3:40 AM Angela Paxos <[lpaxos@optonline.net](mailto:lpaxos@optonline.net)> wrote:

To Superintendent Ted Knight,

1

I am not a resident of Carmel, but I am one of the over 8 million visitors that come to Monterey County each year. I have a love for the outdoors, an appreciation for nature, and a great respect for the serene beauty of the land surrounding this charming town that I love to visit quite often.

The legal boundary of Carmel-by-the-Sea is less than .2 miles from the entrance of Carmel High School – thus your campus at the top of Ocean Ave is the welcoming symbol to a very magical place that has captured the hearts of many people, myself included. History indicates that in 1925, the city passed an ordinance against lighted signs in support of under-stated, artistic signage. Visitors and community members all seem to have pride in their beautiful night skies, twinkling lights and the rolling fog that can be enjoyed from Scenic Drive to the top of Carmel Views.

As the leader of Carmel Unified School District, my understanding is that you are proposing to approve an environmental report that would jeopardize the aesthetic beauty of Carmel. The report calls your proposed changes of installing stadium lights and athletic improvements: **Significant and Unavoidable Environmental Impacts even with Mitigation Measures.**

It's surprising to visitors like myself why anyone would impose such harm in an area designated by your county as protected and sensitive. Please consider assessing other viable locations for expanding your nighttime athletic programs – such as your campus closer to Carmel Valley that would be of lower elevation and away from the heart of the coastline. We've also heard that the tradition of playing sports during the daytime is quite wonderful with the beautiful Santa Lucia Mountains in the background, so perhaps preserve the dark skies with no lights.

While I'm not a resident, I am asking you to do all you can to protect, preserve and promote the cultural heritage of Carmel – a place we all love. Carmel's natural beauty and tranquility are why visitors come. Please don't ruin that

## Response to Letter 41, Angela Paxos

1. The commenter expresses their opposition to the proposed project and expresses their concerns regarding the addition of stadium lights and potential impacts to the scenic and aesthetic value of the greater Carmel area including the night sky. Scenic and visual impacts, as well as nighttime light pollution impacts, are addressed in Section 5.0, Aesthetics, of the RDEIR.

To clarify, the project site is not within the city limits of Carmel-by-the-Sea and not subject to the city's lighting ordinance. In addition, to clarify, the school district Board of Education will be asked to certify the Final EIR and approve the proposed project, not the superintendent. A decision on the proposed project's merits will be made by the Board, who will consider all comments.

In addition, the commenter asks the school district to assess other viable locations for expanding the school district's nighttime athletic programs including the Carmel Middle School location. Section 18.0, Alternatives, of the RDEIR includes an alternative (Alternative 4) which addresses a new, lighted stadium at Carmel Middle School for practices and games.

No changes to the RDEIR are required.

On Wed, Sep 28, 2022 at 3:40 AM James Realty <[jp Realty58@gmail.com](mailto:jp Realty58@gmail.com)> wrote:

To Superintendent Ted Knight,

1

I am not a resident of Carmel, but I am one of the over 8 million visitors that come to Monterey County each year. I have a love for the outdoors, an appreciation for nature, and a great respect for the serene beauty of the land surrounding this charming town that I love to visit quite often.

The legal boundary of Carmel-by-the-Sea is less than .2 miles from the entrance of Carmel High School – thus your campus at the top of Ocean Ave is the welcoming symbol to a very magical place that has captured the hearts of many people, myself included. History indicates that in 1925, the city passed an ordinance against lighted signs in support of under-stated, artistic signage. Visitors and community members all seem to have pride in their beautiful night skies, twinkling lights and the rolling fog that can be enjoyed from Scenic Drive to the top of Carmel Views.

As the leader of Carmel Unified School District, my understanding is that you are proposing to approve an environmental report that would jeopardize the aesthetic beauty of Carmel. The report calls your proposed changes of installing stadium lights and athletic improvements: **Significant and Unavoidable Environmental Impacts even with Mitigation Measures.**

It's surprising to visitors like myself why anyone would impose such harm in an area designated by your county as protected and sensitive. Please consider assessing other viable locations for expanding your nighttime athletic programs – such as your campus closer to Carmel Valley that would be of lower elevation and away from the heart of the coastline. We've also heard that the tradition of playing sports during the daytime is quite wonderful with the beautiful Santa Lucia Mountains in the background, so perhaps preserve the dark skies with no lights.

While I'm not a resident, I am asking you to do all you can to protect, preserve and promote the cultural heritage of Carmel – a place we all love. Carmel's natural beauty and tranquility are why visitors come. Please don't ruin that

## Response to Letter 42, James Realty

1. See responses to Letter 41.

**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding **your** Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

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- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

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1  
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**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

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**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

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- Specify the exact nighttime you are simulating? Show us 9 PM.
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- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Mark & Jennifer Carlson

DATE: Sept. 24, 2022

CONTACT INFORMATION: 408-209-1817, 408-206-0905  
jennifertlee@yahoo.com  
25187 Canyon Dr., Carmel, CA 93923

## Response to Letter 43, Mark & Jennifer Carlson

1. See responses to Letter 2c and Letter 33.

September 25, 2022

To:

Carmel Unified School District  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

1

Has CUSD properly notified previous DEIR "commenters" that the current RDEIR has so many "significant" changes that previous comments received on the original draft EIR will not receive a response or be addressed in the final EIR (page 22).

*In accordance with CEQA Guidelines section 15088.5(f)(1), it is the intent of the school district to address the issues raised in the comment letters received during the public review period for the original draft EIR, in this RDEIR. The school district has substantially revised the former draft EIR, and this RDEIR replaces the previous draft EIR in its entirety. Therefore, the comments received on the original draft EIR will not receive a response or be addressed in the final EIR. Only the public comments received during the 45-day public review period for the RDEIR will be responded to and be addressed in the final EIR.*

For the official record, we'd like our more than **90 signatures** in the neighborhood surrounding Carmel High School to clearly stand as **NO STADIUM Lights and opposed to the project.**

In addition, it's it noted you counted **90 SIGNATURES as ONE Comment**. Please accurate reflect the work done to walk this petition around the neighborhood and allow our voices to be heard as more than one resident. Page 21 is **WRONG!**

*Draft EIR*

*The school district prepared a draft EIR for the proposed project that was circulated for public review from August 13, 2021 to September 27, 2021. The school district received **46 comment** letters and emails during this public comment period, and five verbal comments during a September 8, 2021 Board of Education hearing on the draft EIR.*

*Upon review of the public comments, the school district elected to respond to timely comments on the draft EIR by revising and recirculating it for a second round of public review and comment in accordance with CEQA Guidelines 15088.5.*

One of these Comment is 90 Signatures  
AGAINST THE PROJECT!



Superintendent Ted Knight

September 8, 2021

Board of Education

Tess Arthur

Sara Hinds

Seaberry Nachbar

Kari Pallastrini

Anne-Marie Rosen

Director of Facilities & Transportation

Dan Paul

Subject: Carmel High School proposed Stadium Lights

Attached you will find over 90 signatures from people in the neighborhood surrounding Carmel High School who are opposed to the proposal for stadium lighting. This number could have been higher if the entire neighborhood had received the undated "Notice of Completion and Availability of a Draft EIR".

We are also interested in what deed restrictions were placed upon this land when it was gifted to Carmel High School many years ago.

If you need any additional information please contact:

Rob Wellington  
Joanie Wellington  
831-624-4273

Jill Warner  
831-625-1535

Lynda Strand  
831-277-3494

September 1, 2021

Members of the School Board,

For over eighty years Carmel High School (CHS) has been known for its' beautiful views of the Santa Lucia Mountains and a touch of Point Lobos and the Pacific Ocean. The present football field with these spectacular views reflects the character of Carmel and the surrounding neighborhood. Saturday afternoon games are unique for this reason, and the experience is memorable.

If the proposed stadium lighting is constructed, excessive noise, traffic and very unsafe parking will irreparably change the quiet and safe atmosphere of the encircling neighborhood. The overflow parking on Morris, Carmel Hills and Flanders Drives, due to the very inadequate parking and lighting on the grounds of CHS, will cause a safety hazard for those of us who live here and are not accustomed to dealing with street parking. The noise heard from daytime activities from the PA system and crowds will pale by comparison to the effect it will have over this quiet area at night. It will further add a layer of light pollution that will disturb both the many proximate neighbors along with some wildlife, specifically nocturnal owls that can be confused by light pollution while hunting at night. These animals are critical to maintaining the balance of our area's wildlife population.

Carmel's schools are not in an urban setting. Please do not change that!

To quote the draft EIR dated August 10, 2021, SCH#2021050293:

5-2 "Carmel Unified School District will prepare and adopt a policy that restricts use of Carmel High School stadium by non-school related groups. Any use by non-school related groups shall end before sunset so that field lighting does not need to be used. There are no additional feasible mitigation measures available that would reduce nighttime light and glare impacts of the project to a less-than-significant level. Therefore, this impact would remain significant and unavoidable." Obviously, nighttime school uses will cause the same significant impacts.

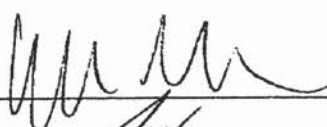
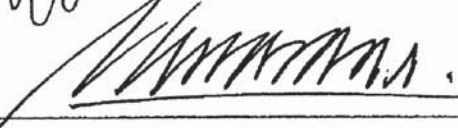

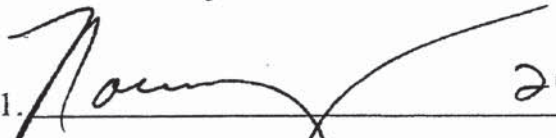
The following people have signed in agreement with this letter. Thank you for your consideration in this matter.



Signature and Address

1. Jane Weinger 25175 Stewart Place Carmel
2. Rob Wellington " " "
3. ~~Joseph G. Cook~~ 25195 Stewart Pl.  
(Joseph Cook)
4. Miguel Rodriguez # 25195 Stewart Pl.
5. Judith Waller PO Box 535 Carmel by the Sea  
25225 Stewart Pl 93921
6. Tracy L. Casty Carmel CA 93923.
7. Got Ann 25165  
Stewart Pl Carmel CA 93923
8. Anshu Kamran 25105 Stewart Pl Carmel, CA 93923
9. Daniel Paul W 25225 N. Carmel Hills Dr.
10. Jessie Jackson 25225 N. Carmel Hills Dr. 93923
11. \_\_\_\_\_
12. \_\_\_\_\_
13. \_\_\_\_\_
14. \_\_\_\_\_

Signature and Address

1. Jill Warner, 25285 Flanders Dr. Carmel
2. Jane Prescott 25193 Flanders Dr, Carmel
3. Susan Love 25199 Flanders Dr., Carmel
4.  25206 Flanders Dr, Carmel
5.  25685 Flanders Dr. Carmel
6. Jim Goren 20060 Via Riviera Carmel CA 93920
7. Mari Wehde 26110 Via Riviera Carmel 93923
8.  26110 Via Riviera Carmel 93923
9. Susan H. Hornum 25224 Flanders Drive Carmel 93923
10. Christopher Manka 24913 OUTLOOK TERRACE CARMEL 93923
11.  24911 OUTLOOK TERRACE CARMEL 93923
12. Joel van der Berg 24911 Outlook Terrace 93923
13. Dana Vogelhoff 24785 Outlook Dr
14. Bill Vogelhoff 24785 Outlook Dr.
15. Susan Miller 24913 Outlook Terr



Signature and Address

1. Jill 25349 Flanders Dr
2. ~~\_\_\_\_\_~~ 25363 Flanders Dr
3. Jim Peelman 25349 Flanders  
Carmel, CA
4. Lindsay Peelman 25399  
Flanders Dr Carmel CA  
93923
5. Elaine Mills 25398 Flanders Dr.
6. Noel Mills 25490 Flanders Dr.
7. Barbara Mills 25372 Flanders Dr.
8. Brent Scott 25745 Flanders Dr
9. Vernia A Scott 25475 Flanders Dr.
10. Seth Busino 25509 Flanders Dr
11. Pam ALNimri 25605 Row P / Carmel
12. Bahar Iranmanesh 25632 Flanders Dr Carmel
13. Miriam Zickman 25527 Flanders Dr  
Carmel
14. Michele Filice 25349 Flanders Dr. Carmel

Signature and Address

1. John Bealle 3141 Camino del Monte, Carmel
2. Deana L Bealle 3141 Camino del Monte, Carmel, 93923
3. Dante Konz 27240 Los Arboles Carmel 93923
4. Karl W Kungz 27240 Los Arboles Carmel 93923
5. J.P. Jeanne V. Phillips 25585 Flanders Dr. 93923
6. Harold V. Sinnhuber 25383 Flanders Dr 93923
7. Walter Berry Darlene Berry 25441 Flanders Dr 93923
8. Jack Foote [Signature] 25461 Flanders Dr. 93923
9. Ed Shindas [Signature] 25461 Flanders Dr 93923
10. Janet C. Dary 25555 Shafter Wy, Carmel. 93923
11. W. H. [Signature] 25193 FLANDERS DR CARMEL 93923
12. Allison A. Mendez 25363 Flanders Dr. 93923
13. \_\_\_\_\_
14. \_\_\_\_\_



Signature and Address

1. Norman G. Fitchworth 25686 Flanders Place

2. Mark Kimes 25633 Morse Dr.

3. Jan Stone 25633 Morse Dr.

4. Lillian Elvira 25634 Morse Dr.

5. [Signature] 25618 Morse Dr.

6. Sue Ann Bland 25901 Morse Dr

7. Yoko Taylor 25539 Morse Dr

8. [Signature] 25582 Morse Drive

9. \_\_\_\_\_

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13. \_\_\_\_\_

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Signature and Address

1. Robert Strand 3745 Whitman Circle
2. Bonnie Gillooky 3835 Whitman Circle
3. Wendi Kirby 3820 Whitman Circle
4. Patricia Kuhn 3815 Whitman Circle
5. Jane Kuhn 3815 Whitman Circle
6. [Signature] 3810 Whitman Circle
7. Cozette Kings 3810 Whitman Circle
8. Anne Kurka Lincoln St.
9. Kristine Andrade 3750 Whitman Circle
10. Lynda Strand 3745 Whitman Circle
11. [Signature] 3775 Whitman Circle
12. [Signature] 3750 WHITMAN CIRCLE
13. Rhonda Cowan 3830 WHITMAN CIRCLE
14. Meredith Stricker 3830 Whitman Circle Carol



Signature and Address

1. Gace Melady 3805 Whitman Cir
2. Mark Marino 3805 WHITMAN CIRCLE

3. \_\_\_\_\_

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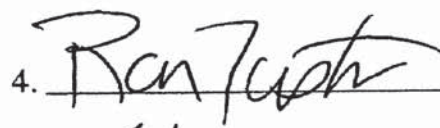
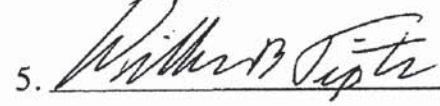


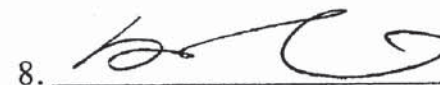
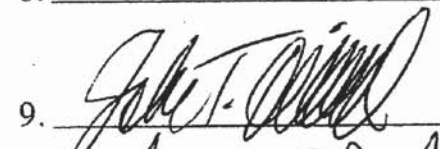
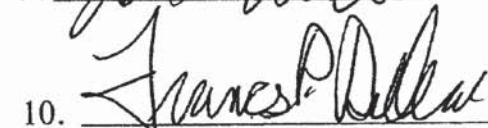
11. \_\_\_\_\_

12. \_\_\_\_\_

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14. \_\_\_\_\_

Signature and Address

1.  KORY KINDER, 25651 FLANDERS DRIVE
2.  Elizabeth Simpkins "
3. Devie Tipton Devie Tipton 25725 Baldwin Pl
4.  RON TIPTON 25725 BALDWIN PL
5.  WILLIAM. B. TIPTON 25725 BALDWIN PLACE
6.  25615 Row Pl. Carmel
7.  25673 Flanders Dr. Carmel
8.  25673 Flanders Dr. Carmel
9.  JOHN T. DILLARD  
25705 BALDWIN PLACE CARMEL
10.  FRANCES DILLARD  
25705 BALDWIN PLACE CARMEL
11. \_\_\_\_\_
12. \_\_\_\_\_
13. \_\_\_\_\_
14. \_\_\_\_\_

Signature and Address

1. Paul William 25241 Ward Place, 93923

2. Bucky Boyns 25262 FLANDERS CAROL

3. Donna Edwards 25245 Ward Place <sup>Carol</sup>

4. Cathryn Heley 25205 Ward Place, 93923

5. Wile Ed 25241 WARD PL. 93923

6. PA 25213 WARD PL 93923

7. Surd Tescher 25263 Flanders Dr. 93923

8. Dik Tom 25263 Flanders 93923

9. Christine Handel 2690 Walker Ave CAROLINE  
CA

10. \_\_\_\_\_

11. \_\_\_\_\_

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## Response to Letter 44, No Name

1. Comment noted. The commenter is noting that on page 22 (page 1-8) of the RDEIR that the school district by preparing the RDEIR, is intending to address issues raised in the comment letters received on the original DEIR in the RDEIR. However, as noted in the RDEIR, the comments received on the original draft EIR will not receive a response or be addressed in this final EIR. Only the public comments received during the 45-day public review period for the RDEIR are responded to and addressed in this final EIR. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.

The commenter does not provide any further comments on the RDEIR and therefore, no further response is necessary.



TO: Superintendent Ted Knight  
 VIA: feedback@carmelunified.org

26 Sep 22

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

Please note highlights

1 We have serious concerns regarding **your** Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - *Updating required school area warning signage*
  - *Consider posted speed reductions down to 15 MPH in school areas*
  - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
  - *Exploring additional stop sign controls at intersection*
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.



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con't.

**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Brent + Veronica Scott

DATE: 26 Sep 2022

CONTACT INFORMATION: 831-250-5217

## Response to Letter 45, Brent & Veronica Scott

1. See responses to Letter 2c and Letter 33.



**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

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**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
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**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

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**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
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**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Mary Lee Singer

DATE: 9.24.2022

CONTACT INFORMATION: 831.595.7899

## Response to Comment 46, Mary Singer

1. See responses to Letter 2c and Letter 33.



**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding **your** Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

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Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Dr. J. Nixhuber

DATE: 9/26/22

CONTACT INFORMATION: 831-625-9096  
25383 Flanders Dr  
Carmel, CA 93923

## Response to Letter 47a, John Sinnhuber

1. See responses to Letter 2c and Letter 33.

From: **John Sinnhuber MD** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>

Date: Sat, Oct 8, 2022 at 4:01 PM

Subject: Public Comment on RDEIR for CHS Stadium

Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.

2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.

3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact



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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from from the Carmel Views neighborhood.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr on 12/7/2021 at 5:48pm:

[https://drive.google.com/file/d/1mOqyqkOWRp60fDM\\_IrZgQMFarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyqkOWRp60fDM_IrZgQMFarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr on 12/7/2021 at 6:21pm:

<https://drive.google.com/file/d/1UpYMHQj-5wRbqb38jhOidluAzZv5pIL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

John Sinnhuber MD

[jsinnhub@gmail.com](mailto:jsinnhub@gmail.com)

25383 Flanders Dr

Carmel, California 93923

## Response to Letter 47b, John Sinnhuber

1. See responses to Letter 2b.



**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

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Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: *Doreen M. Borey*

DATE: *Sept 26, 2025*

CONTACT INFORMATION: *831-126-2812*

## Response to Letter 48, Darlene Berry

1. See responses to Letter 2c and Letter 33.

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NAME: Wendi Kirby (WENDI KIRBY)

DATE: 9/25/2022

CONTACT INFORMATION: wkirbya@gmail.com

## Response to Letter 49, Wendi Kirby

1. See responses to Letter 2c and Letter 33.

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- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME:

*Blase Mills*

DATE:

*9/26/22*

CONTACT INFORMATION:

*blase@blaseberry.com*

## Response to Letter 50a, Blase Mills

1. See responses to Letter 2c and Letter 33.



From: **Blase Mills** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 4:15 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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con't.

4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

-----

#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_lrzqQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_lrzqQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower



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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Blase Mills

[blase@blaseberry.com](mailto:blase@blaseberry.com)

25398 Flanders drive

Carmel , California 93923

## Response to Letter 50b, Blase Mills

1. See responses to Letter 2b.

On Thu, Sep 29, 2022 at 3:48 PM Rochelle Bartholomew <[rochellebartholomew@gmail.com](mailto:rochellebartholomew@gmail.com)> wrote:

1 | As a long time parent, volunteer and community member of Carmel Unified School District and a big fan of Carmel High in general, I SUPPORT the installation of lights for the football field.

I think school games are a wonderful place for kids and families to be supporting the community and student athletes in the evenings.

Thank you,

Rochelle Bartholomew

## Response to Letter 51, Rochelle Bartholomew

1. The commenter expresses support for the proposed project, but does not comment on the RDEIR. A decision on the project's merits will be made by the Board, who will consider all comments. Therefore, no response is necessary.

On Thu, Sep 29, 2022 at 4:21 PM Philip M. Geiger <[philipmgeiger@aol.com](mailto:philipmgeiger@aol.com)> wrote:  
Dear CUSD,

1 | My wife, Lisa Crawford Watson and I wanted to let you know we support the proposed Carmel High School Stadium Improvements.

The high school is an essential part of our vibrant community and we think adding lights and other improvements would enhance the stadium experience for students and others attending events there.

We live right around the corner from the high school and our children have graduated from high school.

Sincerely,

Philip M Geiger  
25743 Flanders Place  
Carmel, CA 93923  
(831) 238-2491  
[philipmgeiger@aol.com](mailto:philipmgeiger@aol.com)

## Response to Letter 52, Philip Geiger

1. The commenter expresses support for the proposed project, but does not comment on the RDEIR. A decision on the project's merits will be made by the Board, who will consider all comments. Therefore, no response is necessary.



On Thu, Sep 29, 2022 at 6:13 PM Katie Heley <[cemurphy80@gmail.com](mailto:cemurphy80@gmail.com)> wrote:

To Whom It May Concern,

1 I felt compelled to send an email after receiving a flyer from "[savecarmel.org](http://savecarmel.org)" in my mailbox. I am absolutely in favor of stadium lighting and I am appalled at the tactics being employed by "Save Carmel". The idea that Carmel needs saving is absurd and the series of "Who" questions, prompted on the paper mailers (so environmentally friendly!) sent out by this group, were offensive to both CUSD and the many community members who have participated in the feedback sessions for this item. Most notably "WHO will ENGAGE THE COMMUNITY and ENCOURAGE HIGH-LEVEL THINKING to CREATE A SUCCESSFUL OUTCOME FOR ALL CONCERNED", reeked of pretentiousness and seemed to indicate that Save Carmel's concerns are being ignored.

I believe that CUSD has gone above and beyond in their efforts to address the concerns raised by Save Carmel and some other vocal residents. It is unlikely that a "successful outcome for *all*" will be found as the definition of success depends on your personal objective. It is obvious that Save Carmel doesn't want stadium lights, so they can continue to enjoy "dark-night skies"(?). If stadium lights are not installed, they will consider this a successful outcome. I, however, will not.

I have followed this issue from afar as I have two young children to raise and I am actively involved in volunteering my free time at their CUSD school. I have not had the time to participate in the feedback sessions. I have not had the time to rally my supportive neighbors to sign "in favor" petitions. I do not think that I am alone in wishing that I had the time to communicate my support for the stadium lights to CUSD. I believe that many younger residents are in favor of the stadium lights. Their voices aren't being heard simply because they don't have the time to speak up. Their silence should not be mistaken for a lack of support or "high-level thinking".

I applaud CUSD's efforts to move this project forward. I hope that they are successful. In the meantime, I hope that Save Carmel will consider adopting a more neighborly tone when expressing their opposition to stadium lights. I truly believe that CUSD and proponents of stadium lights have engaged in "high-level thinking" and have done their best to solicit feedback and address raised concerns around this project.

Thank you,  
Katie Heley

## Response to Letter 53, Katie Heley

1. The commenter expresses support for the proposed project and her dismay at the flyer in her mailbox from “savecarmel.org” but does not comment on the RDEIR. A decision on the project’s merits will be made by the Board, who will consider all comments. Therefore, no response is necessary.

On Thu, Sep 29, 2022 at 8:51 AM LINDY MARRINGTON <[lindymarrington@sbcglobal.net](mailto:lindymarrington@sbcglobal.net)> wrote:

Attn: To Whom It May Concern

1

As a stakeholder in the Carmel Village, I, Lindy Marrington, am adamantly opposed to installing 80' stadium lights at Carmel High School. This action is unacceptable and inappropriate for our beautiful and serene village life. It does not fit. These types of lights are only acceptable in large cities and venues that have lots of open space surrounding them.

It also seems that it is illegal to use a public school property to attempt to generate profit and gain. Federally funded and taxpayer funded schools are not supposed to be used for commercial ventures, which is exactly what this is.

The installation of these lights would bring cords of people, congestion with cars, noise pollution which we already deal with on the highway and excess garbage. The main issue is light pollution in our dark night time sky. I can already hear the cars and motorcycles from my home well into the night. Do not allow this insane idea to destroy what sanctity is left in our community of Carmel.

Lindy Marrington  
Carmel, CA

## Response to Comment 54a, Lindy Marrington

1. The commenter expresses concern regarding light pollution, traffic congestion, and noise associated with the proposed project. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR. Traffic impacts are addressed in Section 11.0, Transportation and Parking, of the RDEIR. Noise impacts are addressed in Section 10.0, Noise, of the RDEIR. The comment raises economic issues that are not considered an effect on the environment, and therefore are not the subject of the RDEIR. No changes to the RDEIR are required.

From: **Lindy Marrington** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 8:33 AM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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Each of the numbered sections below correspond to the numbered items above.

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The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Lindy Marrington

[lindymarrington@sbcglobal.net](mailto:lindymarrington@sbcglobal.net)

4SW of First Ave. on Torres St.

Carmel, California 93923

## Response to Comment 54b, Lindy Marrington

1. See response to Letter 2b.



On Thu, Sep 29, 2022 at 6:08 PM Lisa van der Sluis <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> wrote:

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1 I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet RDEIR still allows up to 400 practices and 124 games at night and also fails to perform a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

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### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm (see pic here) and Outlook Dr at

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6:21pm (see pic here).

a. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

b. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqqykOWRp60fDM\\_IrZgQMFtarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqykOWRp60fDM_IrZgQMFtarGEWSS2/view?usp=sharing)

c. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pIL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 124 games each year that will use the lights. This is practically every day of the school year, so additional mitigations are not just needed but absolutely critical to preserving the scenic vistas and visual character of Carmel:

a. Disallow lights usage on weekends for any use, period.

b. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR does propose a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say, and overrule if necessary, for any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

a. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

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A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR is incorrect and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

a. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

b. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. RDEIR dismisses noise as a significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This has been seen already during current Saturday afternoon football games (see pic here). As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

a. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

D. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate local regulations. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them even if it has the authority to do so.

A. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

B. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this this Monterey County regulation?

a. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

b. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing>

C. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to meet all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be corrected to show that its impacts on both traffic and light will be significant lower than at CHS.

a. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (more cars than on Carmel Valley Road) and residential neighborhood (more homes than around CMS).

b. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >420-ft. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce all of the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Lisa van der Sluis

[lvandersluis@gmail.com](mailto:lvandersluis@gmail.com)

2994 Franciscan Way

Carmel, California 93923



## Response to Letter 55, Lisa van der Sluis

1. See response to Letter 2b.

**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding your Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - *Updating required school area warning signage*
  - *Consider posted speed reductions down to 15 MPH in school areas*
  - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
  - *Exploring additional stop sign controls at intersection*
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.



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**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

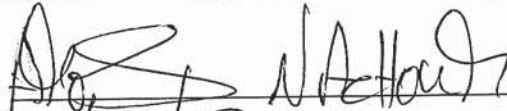
**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: 

DATE: 9/26/2022

CONTACT INFORMATION: Phone: 831.926.1234

## Response to Letter 56, Alos N. Attouh

1. See responses to Letter 2c and Letter 33.



**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

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- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - *Updating required school area warning signage*
  - *Consider posted speed reductions down to 15 MPH in school areas*
  - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
  - *Exploring additional stop sign controls at intersection*
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.



1  
con't.

**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
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NAME: Zhenxing Wang / Anmin Liu

DATE: 09/26/2022

CONTACT INFORMATION: 25673 Flanders Dr Carmel, CA 93923

## Response to Letter 57, Zhenxing Wang

1. See responses to Letter 2c and Letter 33.

From: **Larry Arthur** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 5:40 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

1

\* Other Comments may be similar to my own, but please respond to mine, which are unique.

To CUSD board members and Superintendent Ted Knight:

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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con't.

4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

2

6. There is no stated budget for "additional project conditions" added into the RDEIR.

Each of the numbered sections below correspond to the numbered items above.

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3

### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_IrZgQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_IrZgQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>



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con't.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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con't.

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

F. Project objective should (but does not) include a SAFETY PLAN for both internal Parking Lot Traffic, Internal 18 ft. wide Roadway (incorrectly labelled "traffic aisles" which is terminology for drivable lanes within parking lots), Traffic and ingress and egress onto and from Morris Dr and State Scenic Highway 1 at Ocean Ave and North Carmel Hills Dr to Flanders Dr and Highway 1. Please reply with your Safety Plan or tell me why CUSD Trustees felt it not necessary to include same in the RDEIR for the Safety of Students who drive to and from CHS and for family members who queue on narrow residential streets and high the speed Highway to drop off / pick up their kids.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development

projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37lwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 "would cost upwards of \$72 million dollars" (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

4

6. A Revised Budget was not found in the RDEIR. Please send me the detail of the Revised Budget with breakdowns and totals for all "projects and conditions" including but not limited to: Stadium Lights, Pool Lights; Interior roadwork and paving at the rear (East side) for new Parking Stalls; new construction of 2,800 sq. ft. building with "roof top viewing platform"; Tree Trimming, Cutting and Removal; demolition of Tennis Courts; grading, drainage and paving for 18 ft. internal roadway connecting Main Parking with "tennis court" Parking Lot and "baseball field" Parking Lot; grading and improvements to roadway apron along Morris Dr.; internal pedestrian walkway parallel to "connecting roadway"; and safety and security lighting along these roadways and paths. Thanks for sending this to me, in order to completely evaluate and Comment on RDEIR. Looking forward to it!

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Larry Arthur  
Carmel CA  
Oct 5, 2022

Larry Arthur  
[larry@mntntools.com](mailto:larry@mntntools.com)  
PO Box 22788  
Carmel, Saint Croix Island 93922

## Response to Letter 58a, Larry Arthur

1. See responses to 1, 2, 3, 4, 5, and 5 for Letter 2b.
2. CEQA does not require identifying the budget for a proposed project. No environmental issues are raised. Therefore, no response is necessary. Please see response to Letter 14-2-w, comment 4, and response to Letter 33, comment 17.
3. See responses addressing “Flaws in the Objectives,” “Flaws in the Impacts of the Lights,” “Flaws in the Impact of Noise and Traffic,” “Violations of Regulations/Ordinances” and “Flaws in Evaluating Alternatives” in Letter 2b.
4. No environmental issues are raised. Please see responses to Letter 14-2-w, comment 4, and Letter 33, comment 17. Therefore, no response is necessary.



From: <[larry@mntntools.com](mailto:larry@mntntools.com)>  
Date: Sun, Oct 9, 2022 at 7:30 PM  
Subject: RDEIR Comments: August 25, 2022 Carmel High School Stadium Improvements  
To: Dan Paul <[dpaul@carmelunified.org](mailto:dpaul@carmelunified.org)>  
Cc: Tess Arthur <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, Sara Hinds <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, Seaberry Nachbar <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, Karl Pallastrini <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, Anne-Marie Rosen <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

**My Comments are principally in response to Section 10.0 - 10.4 NOISE**

and are based on my assessment of the 2022 RDEIR. They are unique and are not duplicates of potentially similar comments submitted by other concerned citizens of Carmel. All my comments and questions (below in “red” and underscored) should be evaluated and responded to independently in the Final EIR.

**GENERAL COMMENTS AND CRITICISMS**

**CUSD TRUSTEES - are you ok with this? Why is this a good Plan? How is it good for the Environment, flora and fauna and generations to come? Do tell me. While reading my Comments think of what Plan Elements will cause Negative Effects - that cannot be mitigated... and others that Constituents are sensitive to and have provided thoughtful and viable Alternatives.**

**Student and Traffic Safety and increased congestion should be your #1 priority followed closely by protecting and preserving Carmel areas natural environment - flora, fauna, visual (views and Dark Sky) and acoustic. Please keep this in mind while carefully reading and responding to my Comments:**

The Revised Draft Environmental Impact Report (RDEIR) released August 25, 2022 is cumbersome (394 pages with a "bonus" 379 page Appendix), grossly incomplete and inconclusive. Many "conclusions" sought by Superintendent Ted Knight, the Board of Trustees and the Carmel Unified School District have been drawn from assumptions and evaluations of other studies and locations (rather than CHS field tests, data assemblage and accurate reporting) and therefore are not relevant to Carmel High School and should not be included in this Proposed Plan. Furthermore, as Trustees, you have stifled public participation by limiting communication from stakeholders to one-way statements, without dialog, direct response or offer of collaboration with your constituents. This has triggered several California Public Records Act requests (CGC SEC. 6252(C) - some directly requested and other communications "assumed" to be a formal CPRA request - costs us taxpayers bear that could have been minimized by open, honest and direct communication. It does no service for The Superintendent CHS Principal and other CUSD Officials to say CPRA requests divert funds away from students. Better would be to say how much unreported or hidden expense will be attributed to this ever expanding boondoggle of a Plan. In particular great effort has been made by The Save Carmel Group (Carmel Area Residents who are parents, professionals, educators and scientists) to provide critical, factual input in person, via email, letter and written reports (see [savecarmel.org](http://savecarmel.org)).

With the release of the Aug 25, 2022 RDEIR it became obvious the Proposed Objectives and Proposed Plan have undergone massive changes from CARMEL HIGH SCHOOL STADIUM LIGHTS (published Aug 10, 2021) to a more encumbered and dismissive CARMEL HIGH SCHOOL STADIUM IMPROVEMENTS - published Aug 25, 2022. Now there is a new project scope with several new surprising elements: demolition, new building construction, grading & road paving and even more lighting - all lacking detail and without published budgets. None of

these elements in the RDEIR have previously been advertised, introduced to the public in scoping sessions or discussed with constituents. This alone should trigger a COMPLETE STOP of THE CURRENT PLAN AND PROCESS AND REQUIRE A COMPLETE START-OVER.

All Plan elements raise additional concerns and frustrations - with specific Sections (identified by page number and description)... result of the process and procedure CUSD has chosen to follow. In my Comments are posed as PROBLEMS, CRITICISMS, QUESTIONS and SOLUTIONS (Mitigations) for your ease of understanding. After Trustees have read, studied and analyzed these formal Comments, I will anticipate and appreciate your written response to each individual Comment and [Question](#).

**OVERVIEW**

NOISE generated from the Carmel High School Stadium by regularly scheduled daytime Sporting Games & Practices has been tolerated for decades. During daytime, Noise from the CHS Campus and Sports Fields is but one element of the daytime Noise we hear. Installing lights and shifting stadium use to the normally quiet dinner and evening hours will cause Significant Noise Increase during 5:00 pm - 10:00 pm and a host of other problems. Noise Increases during the traditional quiet dinner and evening hours would be disturbing and therefore unacceptable to residents - both neighbors close by and also those well beyond 1 mile and possibly out to 3.5 miles (the arbitrary limit of the Plans "Light Circle"). Many "distant" neighbors have direct sight of CHS Campus and therefore are well within the cone of sound waves emanating from the Campus and Football Stadium. The later has not been measured, analyzed or taken into consideration by CUSD. In addition to Light bleed, increased rush-hour Traffic concerns, Parking Lot and internal roadway limitations, complicated and uncontrollable Shuttle Logistics, Student Safety Issues - the Noise Section is critically flawed and only one of the factors for halting this Plan, FULL STOP.

2 Furthermore proposed Stadium Lights would enable other after-dark High School uses (up to 144+ sports team practices, plus band & cheer practices, rallies, etc) and with consideration of evening Pool use well over 400 evening uses. Installation of Lights would greatly increase likelihood and number of late afternoon (Winter) and evening use potential (Fall, Winter, early Spring) - for all team sports - with inherent and more undesirable Noise Impacts.

3 The Civic Center Act allows CHS to lease The Pool, Performing Arts Center and Stadium (plus other CUSD assets) to groups or businesses via [www.Facilitron.com](http://www.Facilitron.com) - a facility management firm. The District Superintendent has stated in recorded public meetings that leases would not happen, but promises made have not been kept (see below) and no formal written exclusion has been forthcoming. Today Facilitron continues to offer rental of CHS Stadium!

4 Although noise may not continuously reach the Monterey County maximum noise limit of 85 dBA for outdoor events (held between the hours of 7 am - 10 pm), it can and will reach this threshold and will "spike" past it. Amateur audio recordings of widely used and accepted mobile phone applications calibrated to National Institute of Occupational Safety and Health (NOISH) Standard have ranged from 80.5 dB to 83.5 dB - when taken over a mile from Campus.

>>>See Photo IMG\_2972: 9/17/22 @ 4:05 pm, Location 24980 - 25000 Outlook Dr, 93923, 83.5 for 5M:43S, Max 92.4, Peak 98.8 <<<

Values for recordings at the "fence-line" of the Stadium Field during the recent "Shoe Game" Saturday Sept 17, 2022 regularly went as high as 85 dB and spiked even higher - max at 103 dB and peak 112.6 dB. The higher values were in response to whistle blasts, pep band music and shouts and cheers for significant plays. Air horns are even louder.

>>> See Photo IMG\_2957: 9/17/22 @ 2:50 pm, Location: Field Fence, Visitors Side W of Stands, 85.0 for 2M:4S, Max 96.0, Peak 101.0 dBA <<<

See: <https://www.co.monterey.ca.us/home/showpublisheddocument/15413/636162035527170000> for Sec 4.10 Monterey County Noise Ordinances

NOISE is "invisible" and challenging to contain... but we all know what we hear. Convincing Trustees to "hear what we hear" has been an impossible task. Of the 5 CUSD Trustees, *none* have met with constituents (aka "sensitive receptors") in public places within their neighborhood (aka residential land uses) to experience Noise generated from CHS. Thus far, Noise Mitigations (PA system optimization & maximum loudness limits, berms, barriers, deflectors or absorbers) have not been considered, utilized, tested or integrated into the Plan. At present, a "noise transparent" chain link fence is all that is between the CHS Noise source and us "sensitive receptors" (neighbors & area residents). Noise can travel great distances without containment and effective mitigation.

See: <https://www.creativefieldrecording.com/2017/11/01/sound-effects-decibel-level-chart/> for comparable Sound Levels and Noise Induced Hearing Loss to offer reference and perspective. Example: Quiet Office 40 dB; Loud Traffic 85 dB (for every 3 dB above 85 safe exposure time is reduced by half); Loud Sporting Event 105 dB; Ambulance Siren 120 dB; Jet Engine 135 dB. Most folks can relate to these Noise Values.

WIND affects the speed, distance travelled and spread of Noise. Our local prevailing winds are "on-shore" and thus "push" Noise from the CHS Stadium Eastward into residential neighborhoods - which can cause disturbing impacts to residents and property owners - particularly if experienced in traditionally quiet evening hours. Example: if a jet takes off at 200 ft distance sound level 100+ dBA (Appendix B, pg 38 or 40 depending on who's counting) during the daytime, it is heard along with many other "daytime" noises and is a fraction thereof. If the same 100+ dBA jet took off (same distance) while you were having a quiet evening meal, it would be the loudest and most prominent noise and therefore have a greater impact to you "the sensitive receptor". It would also likely be more disturbing. This would also be true for the shift of Saturday football Noise to Friday Night (under the Lights) football Noise - even for those a mile or more away from CHS Stadium. No measurement, analysis or reporting of actual CHS Stadium Football Game Noise has been performed - why not? In your answer, don't blame "Covid".

To better understand, the velocity of the acoustic wave (sound wave) is equal to the speed of the wave (approximately 334.1 Meters per Second) PLUS the speed of the wind in the same direction. For instance, if the wind is moving at 20 mph from the ocean (8.9 m/s), then sound will travel downwind (East) at 351.9 m/s, upwind (West) at 334.1 m/s, and crosswind (North or South) at an average of approximately 343 m/s. The Noise "content" is the same but reaches us "sensitive receptors" at slightly different times, intensities and distances. Given higher velocity noise can travel *great* distances. This is why a comprehensive Noise Study for any CHS Light or Stadium Improvements Proposal must include

cont. geographic locations out to the limit of human perceived Noise Impacts. Otherwise how could any Impact Report dutifully and comprehensively capture the limit (both level and distance) of acceptable sound travel? Please tell me why this was not done.

With the “push” of typical weather and prevailing onshore winds from the Pacific, Noise energy and waves from CHS travels far beyond one mile:

>>> See Photo IMG\_2978: 9/17/22 @ 4:20 pm, Location: 24790 Outlook Dr, 93923, 80.5 for 9M:10S Max 92.4, Peak 98.8 dBA <<<

## PREFERRED ALTERNATIVE

The simplest solution to Noise is “NO CHANGE”. Continue Saturday football games - which are family friendly, relatively “safe” and have a “picnic-like atmosphere” - while enjoying the treasured views of the Santa Lucia Mountains, White Rock Ridge, Rancho San Carlos, Saddle Mountain, Palo Corona Regional Park, Fish Ranch, Carmel Valley and surrounding neighborhoods. What could be better than munching an Impossible Burger, slurping a Wheat Grass Smoothie, cheering for our CHS Team and taking in the sights on a nice Saturday afternoon? This saves well over \$4.5M+ (budgeted amount for original Stadium Lighting only) plus ADDITIONAL SIGNIFICANT SPENDING - demolition, construction and installation for newly added projects (the “pork”) - which is *not* reported in the RDEIR. Where is this budget hiding? Please produce the detailed Budget Report and breakdown for each of the added on Project Conditions. These monies can be allocated to better purposes - busses and drivers to solve on-site parking limitations for all events and shuttling of students and athletes to other courts and playing fields for both practice and competition. This includes boys *and* girls track, baseball, field hockey & soccer - sports proven to be much safer than football. Monies could be used for maintenance of tennis courts and other fields, sports equipment and improved Visiting Team experience and amenities: additional permanent stands, a restroom and satellite snack shack. Monies could also be spent for planting trees, shrubs and bushes with a dual purpose: to buffer sound and contain walkway and security lighting - most evident (and needed) at the Eastern elevation of CHS. Late Start will be a bonus - benefiting all students health. Combined with a new Bell Schedule (many districts have already complied with this State mandate) Late Start will provide for an additional half hour period for sports team participation. Why hasn't the District and CHS implemented a Late Start plan? Do tell me why our Trustees have not done what many other Districts have and publish a date this will be accomplished. I'd like to know.

Also plan on (and support) the anticipated passage of Federal H.R. 69 - The Sunshine Protection Act, which will create an “additional hour” of afternoon daylight - for practices, Junior Varsity games and other sports. It's going to happen, and you, Trustees need to incorporate this into your strategy and actions.

By the way, while attending recent Saturday games - there was plenty of football “cheer”, “student spirit” and “family participation evident - from babes-in-arms to entire families including grand parents - both at the PGHS “Shoe Game” Aug 27, 2022 and the Home Coming league game against Everett Alvarez, Sept 17, 2022. These games presented a perfect opportunity for sampling and recording Noise data - and would have been basis for science driven decision making rather faulty assumptions contained in the RDEIR. Some families and some family members will miss the proposed Friday night “under the lights” Football games - parent(s) may have to stay home with young children and some elderly folks may choose not to drive “after dark”. Students with provisional drivers licenses and other teen drivers who commute a greater distance and won't make it home by 10:00 pm may end up stranded. I'm sure students and football players have not thought of this - have you Trustees? Inform me and them.

For those of you who may not have attended the “Shoe Game” here is snip with a (mostly unobstructed) skyline. Light towers and multiple arrays of LED emitters would compromise this beautiful view. Lots of “cheer”, whistles and unusually warm day with bright clear sky.

>>> See Movie MOV\_0063: 8/27/22 @ 2:08 pm, Location: Field Fence, NW corner of Stadium <<<

## COMMENTS, CRITICISMS, QUESTIONS AND SOLUTIONS

### pg 35 Table 2-1 Summary of Significant Impacts and Mitigation Measures

PROBLEM: Mitigation Measure 5-2a \* “Lights shall be used for only up to the following number of nighttime events for each of the following Carmel High School sports teams.” ... “Practices. All field sports practices shall end by 8:00 pm with lights turned off by 8:30 pm”.

CRITICISM: No quantification or seasonal calendar is provided for Practice Lighting. This spans the quiet dinner hour.

QUESTION: Why was the substantial number of days when Practice Lighting will be on until 8:30 pm not included in this

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RDEIR? Please list all dates, times and number of Stadium and Pool uses that will require light tower arrays turned on. Specify when lower level practice lights and also higher level "competition" lights will be used in your Report and send it to me. This needs to be detailed for meaningful consideration of any proposed mitigation.  
 SOLUTION / MITIGATION: Go back and count and include the number of scheduled and/or planned Practice Lighting days and times to be transparent. Please inform me. It's impossible to draw a conclusion or make meaningful Comment from incomplete facts.

7

**pg 39 Table 2.1 Summary of Significant Impacts and Mitigation Measures**

PROBLEM: Impact 10-3 Construction Activities Could Cause a Substantial Temporary Noise Increase (7am to 7pm Mon-Sat).  
 CRITICISM: Noise up to 7 pm is disturbing during the traditional quiet dinner and early evening hours.  
 QUESTION: Has any Noise Study of a similar construction project adjacent to mature forested "residential land uses" been performed? What are the results? Please share with me. Why not include measurements and some facts (instead of assumptions)?  
 SOLUTION / MITIGATION: Abandon the Stadium Light installation and Improvements Project and all the construction and Noise producing equipment: bull dozers, graders, chain saws, nail guns, paving machines, etc. Continue with Saturday afternoon football and regular practices that have been tradition for decades.

**10.1 ENVIRONMENTAL SETTING**

**pg 259 Acoustic Fundamentals**

PROBLEM: Community Noise Equivalent Level (CNEL) - averages sound level over 24 hours plus 5 dB. CRITICISM: CNEL average sound levels are merely "base-lines" for comparative purposes. CNEL averages do not include spikes or maximum noise levels (whistles, drums, loud cheers, air horns, band practices etc) at particular time periods. A more appropriate and Accurate Method would be to measure and record ambient sound during the 7am-10pm period and compare this quiet with actual Saturday Football game sound measurements and recordings.  
 QUESTION: Why weren't evening ambient base line measurements compared with actual on-site sports team use during Saturday daytime competitive football league games? Please report actual Noise Level (CNEL) values. I look forward to your answer.  
 SOLUTION / MITIGATION: Redo and provide actual measurements during typical Saturday 2 pm to 5 pm Stadium Football Games recording and reporting Average, Peak and Maximum Noise and compare to Ambient Noise during hours of 6 pm to 10 pm - the period of my concern. Report the Noise Increase from evening Ambient to evening Football.

**pg 259 & 260 Site Inspection and Noise Level Measurements**

PROBLEM: Site inspection by WJV Acoustics dated July 6 - 2021. We need a *new*, comprehensive and applicable inspection, measurements and comprehensive Noise report.  
 CRITICISM: Ambient noise level Measurements were conducted April 20 and 21, 2021 and not representative of Noise generated by Fall, Winter and early Spring sports practices and actual interscholastic Football competition.  
 QUESTION: Why weren't Noise Measurements performed during the "Shoe Game" and also league Football games and other practice and competition times? Relevant Noise Measurements need to be conducted (see above) and Reports published. When will this be done? Please send them to me.  
 SOLUTION / MITIGATION: Redo noise level measurements to capture accurate "worst case" noise impacts over a date period consistent with CHS Football season and during actual games and hours. Share the details.

>>> See Photo IMG\_2952: 9/17/22 @ 2:45 pm, Location: West Field Fence Line (home team cheering), 76.0 for 6M:39S, Max 101.1, Peak 112.6 dBA <<<

**pg 259 & 260 Less Acceptable New Noise**

PROBLEM "a new noise would be less acceptable if it exceeds the current ambient noise level."  
 CRITICISM: A shift of Noise impacts from day to night time (Saturday Football to Friday night Football as example) must be measured real-time with increased impacts reported relative to the experience of residential "sensitive receptors" - both near and farther away from Carmel High. Noise level measurements (below the horizon, lower than Stadium and strategically positioned within trees and bushes) are not representative.  
 QUESTION: What is the measured Evening Noise (dBA) base line for typically quiet evening hours (6-10 pm) in each of these areas: along Morse, Flanders Drives and in Carmel Knolls, Rancho Rio Vista and Carmel Views) - particularly in line of sight of the Football Stadium? What is the measured increase for Friday night football games over the Ambient Evening Noise (dBA base line) at these same measurement locations? Trustees - let's do the science and report back to me.  
 SOLUTION / MITIGATION: Redo noise level measurements to accurately capture typical quiet evening hours - from 6-10 pm and compare with "worst case" noise impacts - from current Saturday afternoon games. See above. Even when 25-30



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cont. feet away from Field Fencing and facing away from Stadium Field and Noise source, Noise Measurements Maxed and Peaked above 85 dBA - more then 75-80 ft away from the playing field and source:

>>> See Photo IMG\_2958: 9/17/22 @ 2:52 pm, Location: CHS Tennis Courts, looking South away from Noise Source 70.8 Max 96.0, Peak 101.0 dBA <<<

>>> See also Photo IMG\_2954 (Carmel Padres Leach Champions) and IMG\_2955 (Tennis Court Hours for the Public) 9/17/22 @ 2:46 pm, Location: CHS Tennis Court (North) entrance gate.

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**pg 260 - Baseline Noise Conditions**

PROBLEM: Baseline Noise was only measured at locations near CHS campus and two surrounding streets - Morse Drive and Flanders Dr.

CRITICISM: Baseline Noise measurements were not taken for "farther afield" locations - such as in quiet residential neighborhoods where CHS Stadium Noise Impacts are typically heard.

QUESTION: Why limit Noise measurement(s) to arbitrary locations close and adjacent to campus perimeter or along nearby streets? What different outcome (for Baseline Noise) would be had by a more comprehensive Report, sampling both near and farther away public areas in neighborhoods? Answer please.

SOLUTION / MITIGATION: Noise travels far as "pushed" by prevailing on-shore winds. For a comprehensive evaluation of Noise Impacts, several remote locations (some over 1 mile) should be identified, measured, recorded and compared to each individual locations Ambient Noise Levels, noting local Noise Increases. Typical quiet roadside walk Sunday morning after "Shoe Game". Area residents (aka "sensitive receptors") and other inhabitants appreciate the environment devoid of external Noise intrusion.

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Animals, including Canis Adventurous (shown here) avians, serpientes and even the cute little Red Legged Frogs that abound - all have highly evolved and incredibly sensitive aural receptors. Noise increases during the quiet evening hours (that they're accustomed to) will likely have negative effects disturbing sleep patterns, feeding cycles, reproductive cycles, nesting and burrowing locations and their general well being.

>>> See Photo IMG\_2979 9/18/22 @ 10:08 am, Location: Outlook Dr X Pine Hills Dr 93923, 36.5 dBA 18S <<<

**10.2 REGULATORY SETTING**

13

**pg 261 - 2010 Monterey County General Plan**

PROBLEM: "While the school district is not subject to County noise regulation, the County noise standards are utilized as the applicable noise standards for which the project is evaluated against to help determine noise impacts."

CRITICISM: County noise regulations are general and do not account for construction, expansion projects that increase density of use (additional parking, cars, trips to and from CHS and increased football game attendance) and importantly time shift (from Saturday daytime to Friday nighttime) that result in significant NOISE INCREASES at typically quiet evening hours.

QUESTION: In keeping with the spirit of noise ordinances (not to disturb neighboring "sensitive receptors") why risk upsetting a significant portion of Carmel areas residents by "adding" noise to otherwise quiet Friday evenings? How will your Plan really affect Carmel Area neighbors? What are the measurements and calculations that quantify these Noise Increases? An answer will be appreciated.

SOLUTION / MITIGATION: Respect decades of football tradition and Saturday competitions - and limit noise impacts to daytime.

14

**pg 262 Safety Element**

PROBLEM: Policy S-7.3 "Development may occur in areas identified as "normally unacceptable" provided effective measures to reduce both the indoor and outdoor noise to acceptable." CRITICISM: The Stadium is surrounded by open chain-link fence on 3 sides and classroom buildings on 1. There has been no attempt to contain, absorb or deflect back Noise that's generated at the CHS Stadium. In fact poor choice of aluminum bleachers reflect and project sound (clapping, cheering, PA system, foot stomping, band noise, etc)

QUESTION: Why not treat the Noise Problem at its source? What can be done to reduce Noise production? What amount of Noise bleed could be contained? Have any comparative measurements been performed? Please report the facts to me.

SOLUTIONS / MITIGATION: Enhancements to existing fences (wooden or metal slats) are inexpensive and easy to install; acoustic sound walls (like those surrounding utility equipment) could be built along campus and stadium perimeter; sound blocking and absorbing plants (hedges, bushes, shrubs, trees) could be planted as well. These measures would also help with the "light bleed" from the East elevation of CHS.



15 **pg 262 Acoustical Analysis**

PROBLEM Policy S-7.6 "Acoustical analysis shall be part of the environmental review process for projects when:" "a. Noise sensitive receptors are proposed in areas exposed to existing or projected noise levels that are "normally unacceptable"...

CRITICISM: No acoustical measurement or analysis has been done at locations where CHS Stadium Noise has been disturbing: ie where the difference of "quiet time" base line Noise (35 dB at public location in my neighborhood - see above and IMG\_ 2944 below) is greatly exceeded by actual measured Saturday "football competition" Noise (83.5 dB, Max 92.4 and Peak 98.8 at public location in my neighborhood).

QUESTION: With constituents eager to collaborate and provide input (over the last 14 months or more) - why were several neighborhoods excluded from sound measurements and analysis of the Noise increase from ambient lows to "Friday night football" highs? How could you improve the Proposed Plan with collaboration and input from Carmel Area residents?

SOLUTION / MITIGATION: Ask constituents who report being Impacted, measure from locations representative of the Noise impacts they experience and work with them for a balanced outcome.

>>> See Photo IMG\_ 2944: 9/17/22 @ 9:46 am (before Shoe Game), Location: 25205-25095 Pine Hills Dr 93922 - at roadside bench, 38.4 1M:44S Max 82.7, Peak 85.3 dBA <<<

16 **p263 County of Monterey Noise Ordinance\***

SS10.60.030 - Operation of noise-producing devices restricted.

PROBLEM: "At any time of day, it is prohibited within the unincorporated area of the County of Monterey to operate, assist in operating, allow, or cause to be operated any machine, mechanism, device, or contrivance which produces a noise level exceeding eighty-five (85) dBA measured fifty (50) feet therefrom."

CRITICISM: Noise escaping (not presently being contained) from Carmel High School Stadium has exceeded 85 dBA - see photo:

>>> See Photo IMG\_ 2957: 9/17/22 @ 2:50 pm, Location: Field Fence, Visitors Side, 85 for 2M:4S, Max 96.0, Peak 101.0 dBA <<<

QUESTION: Although CUSD / CHS has exempted themselves from following County Noise Ordinances\* (this is not neighborly), Noise is not being contained and does bleed "through the fences" and into County neighborhoods. What can be done to encourage CHS to be a better neighbor by reducing noise production at the Stadium in consideration of their very (tolerant) neighbors - both near and farther afield? I'd like to know. SOLUTION / MITIGATION: CUSD and CHS could follow the "spirit" of the Ordinance and *reduce and contain* Noise Impacts and thereby reduce Impacts to all constituents and area residents.

\* **p264 See also 2010 Monterey County General Plan and CNEL** (Community Noise Equivalent Level) average Noise Level for 24 hr day with 5 dB penalty for Noise levels occurring during evening hours between 7 pm and 10 pm.

17 **p 266 Acoustical analysis is part of environmental review**

PROBLEM: Policy S-7.6 Acoustical analysis shall be part of the environmental review process for projects when: "Noise sensitive receptors are proposed in areas exposed to existing or projected noise levels that are 'normally unacceptable' or higher."

CRITICISM: No acoustical analysis was included in RDEIR for (these areas) - see Problem. No Noise Measurements or Acoustical Analysis has been done for residential land users West of Scenic State Highway 1. QUESTION: Why was an arbitrary decision made to only measure noise immediately adjacent to CHS Campus and adjoining Morse Dr and Flanders Dr locations (which sits well below Stadium level) - but not other areas impacted by Noise? What are the facts and how would this change your Plan? Pray tell.

SOLUTION / MITIGATION: As before, identify public locations in neighborhoods (both nearby and remote) impacted by Noise from CHS Stadium football games. Sensitive receptors West of Highway 1 are impacted by "spikes" and Noise "max" as heard over Scenic Highway traffic at public locations. This is also true for remote and ridge top "residential uses" East of CHS and neighborhoods in most directions. Collaboration with constituents would have included these Impact Sites and encouraged measurement and reporting. Be more thorough and transparent.

18 **p 268 Building Codes & Interior Noise**

PROBLEM: "Section 1207.4 of the California Building Code states 'Interior noise levels attributable to exterior sources should not exceed 45 dB in any inhabitable room.'"

CRITICISM: We all live in a mild marine influenced climate. Many of us leave doors and windows open 24 / 7 and enjoy our outdoor spaces - decks, yards and take quiet evening walks. As science dictates, sound travels faster and farther as driven by wind. Historically, prevailing winds in the Carmel area are "on-shore (blowing West to East) and carrying sound

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along with it. As the CHS Stadium is on a hill (estimated 30-60 ft above surrounding terrain), wind driven Noise travels unimpeded "over" lower surrounding areas (swales, valleys and canyons) and impacts ridge top public spaces, residential dwellings and their "sensitive receptors".

QUESTION: Why is there no mention in Plan to buffer noise generated at CHS Stadium? This would be a smart move. Educate me with the positive steps CUSD could take for Noise reduction and containment and the quantified net result of these steps!

SOLUTION / MITIGATION: Enhancements to existing fences (wooden or metal slats) are inexpensive and easy to install; acoustic sound walls (like those surrounding utility equipment) or concrete block walls could be built along campus and stadium perimeter; sound blocking and absorbing plants (hedges, bushes, shrubs, trees) could also be planted with good effect. This would also help contain escaping light and reduce overall Impacts to neighboring and Carmel area residents.

### 10.3 THRESHOLDS OR STANDARDS OF SIGNIFICANCE

19

#### pg 269 Significant Impacts

PROBLEM: "Therefore, for purposes of this EIR, a significant noise impact would occur if implementation of the proposed project would result in: Generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project... "

CRITICISM: Noise impact increases affecting "sensitive receptors" in surrounding areas have not been measured, quantified, reported or included in this RDEIR".

QUESTION: Why set arbitrary limits? Why not let science dictate this process? My 8th grade science teacher would not be happy. Please enlighten me (with the science).

SOLUTION / MITIGATION: Increase the range and scope of Noise Impact measurements and include them in new DEIR for Discussion, Comment (and hopefully) dialog.

20

#### pg 270 Assumptions and Unsupportable Conclusions

PROBLEM: "Applying the noise levels measured at the Mineral King Bowl in Visalia - this venue seats 8500 spectators, is in a dry climate, at higher elevation and the surrounding topography is flat!

CRITICISM: Carmel is not Visalia. Extrapolating data from another study and using it for this project is unprofessional and a short-cut to unsupportable conclusions. Weather & atmospheric conditions unique to Carmel - including seasonal coastal fog, stiff onshore breezes, topography, flora, fauna, temperature and other variables all affect Noise transmission and impacts perceived by "sensitive receptors".

QUESTION: Why take the short cut, rather than do the work? I'd like CUSD to tell me. Scientific measurement will trump evaluations, estimations and "hope" every time. Please do the science and share your results - for my understanding and further Comment.

SOLUTION / MITIGATION: Take real measurements, during actual CHS Football games at times weather & wind drives Noise Eastward. Determine fence line (close to same elevation as football stadium field) and also line-of-sight sampling locations on ridges and hills surrounding the CHS Campus and farther out. If you can "see it" (homes, mountains, ridges) from the CHS Campus, Noise expanding outward will be heard from "what you see". Get input from Carmel Area residents and constituents. Report the science.

21

#### pg 270 Maximum Noise Levels

PROBLEM: "The worst-case assessment of football game maximum noise levels at nearby residential land uses is between approximately 60 to 70 dB."

CRITICISM: An assessment is an evaluation or estimation - in short a judgement - not a fact based conclusion... and certainly not comprehensive measurement.

QUESTION: Again why not do the science? It's necessary to thoroughly measure Noise at "nearby residential land uses" and publish a detailed, comprehensive report order to understand Proposed Plan, its merits and also deficiencies and submit Comments. Please send me this report.

SOLUTION / MITIGATION: Hire a *different* acoustic engineering firm that will perform comprehensive measurements at public locations in neighborhoods aka residential land uses agreed upon between Trustees and Concerned Constituents. Noise sampling should gather, report and compare average, peak and maximum Noise data for current daytime football games held 2-5 pm with ambient readings for "quieter" hours of 7-10 pm at the same precise locations. Report the Noise Increase for 7-10 pm.

22

#### pg 270 Nighttime Stadium Events

PROBLEM: "Therefore, the operational noise increases generated by nighttime stadium events would be less than significant."

CRITICISM: See above problem. It's not possible to make a conclusion based on assumptions and lack of scientific process. This is a poor reflection on what (should be) taught to our High School students.

QUESTION: Why do CUSD Trustees fail to understand that shifting Noise Impacts from a typical Saturday afternoon (with

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cont.

adjacent highway traffic and other typical noises) to a much quieter Friday evening (fewer Noise sources and lower Ambient Noise) is Significant? Please provide this data to me.

SOLUTION / MITIGATION: It's simple, honor tradition (you are keeping the Padre Mascot, right?) and stay the course with Saturday afternoon games - which the students, parents, staff, teachers, coaches, players and all of us surrounding CHS are used to. Saturday daytime play has plenty of pep and school spirit for all. Better visibility for players and therefore likely lower injury potential (there were five - 5- play stopping, time out, on field, player injuries during the "Shoe Game" - Aug. 27th this year. Was the traditional (non-league) Shoe Game included in your count of football games? This baseline data will help me compare. Answer please.

23

**pg 271 Parking Lot Noise**

PROBLEM: " At these distances [100 and 200 ft.], maximum (Lmax) parking lot vehicle movements would be expected to be approximately 54-59 dB at the closest residential land uses to the parking area in the tennis court area..."

CRITICISM: Expectations and approximations are not conclusive and lead to false assumptions. Adding parking lots, increasing number of parking stalls, supporting more auto movement on CHS campus will increase Noise Impacts.

QUESTION: Where's the science? For realistic Noise Impact measurements, why weren't actual Peak and Maximum Noise Impacts recorded from existing Parking Lot(s) at typical times when entire parking lots were being emptied at conclusion of a major football game? This is critical to my analysis. Please tell me.

SOLUTION / MITIGATION: The previous paragraph mentions "voices, stereo systems, and the opening and closing of car doors and trunk lids." Add to this the sound of cars starting up, revving their engines (multiplied by the number of cars) plus shouting, cheering, honking, etc. which is typical from an energized post-game crowd. Measure and report this for both CHS Main Parking Lot and also the Bus transfer parking lot at Middle School. Please!

24

**pg 271 Traffic Management Plan (not found)**

PROBLEM: "rerouting some traffic to CMS and shuttling attendees to sporting events at the high school stadium, encouraging a reduction in the use of adjacent residential street parking through utilizing alternative modes of transportation and preventing non-residents from accessing certain neighboring streets during high school events and providing supervision to insure a smooth flow of traffic and manage unforeseen disruptions."

CRITICISM: assumptions: rerouting "some" traffic, encouraging a "reduction", "alternative" transportation, "preventing" non-residents, providing "supervision", "manage" unforeseen disruptions). These are all hopes and prayers that amount to nothing more than wishful thinking. This is not a traffic management plan. There is no stated realistic, reliable, consistent mechanism to insure any of these hopes and prayers - and the related Noise they cause - can be achieved.

QUESTION: Why is there no comprehensive Traffic Plan, detailed analysis or solution? Please perform one and publish the results. I'm eager for your detailed response.

SOLUTION / MITIGATION: Do the work! Noise Impacts must be quantified to be understood. Don't shift some of the (Noise) Problem to Middle School without gathering Noise measurement facts and including achievable Mitigations in the Proposed Plan - for both CHS and CMS.

**pg 330 ENVIRONMENTAL IMPACT (chart)**

25

**Impact 10-1 "Project Generated Traffic Would Occasionally Increase Existing Noise Levels"**

PROBLEM: Level of Impact for Proposed Project was reported as LTS (Less Than Significant)

CRITICISM: This does not include analysis of the *shift* of Noise Increases from daytime to previously quiet evening hours - which makes this "*Significant*" and is not merely "occasionally". The Noise Impact Increase would be heard *consistently* during every minute of each Friday nighttime football game and every other nighttime sport or other use of the CHS Stadium and Pool - reported to be over 400 night time uses per year. Noise also will disturb and displace birds, animals, amphibians and Serpentes.

QUESTION: Why weren't Increases in Noise Levels reported in the RDEIR for the time period 6 pm (spectators arriving for Friday night football) to 10 pm (CHS Parking Lots promised to be cleared)? Please tell me. Without this information it is impossible to understand the proposed Noise Impacts.

SOLUTION / MITIGATION: Publish Maximum and Peak Noise Data from most popular and well attended Saturday 2 pm - 6 pm Football games and compare it to ambient Noise Data for typically quiet Friday evening hours 6 pm to 10 pm. Change the Impact to Significant. Use shielding, buffering, dampening materials, planting of bushes, shrubs and trees, fencing, walls and optimize the public address system with maximum volume limitation and low-mounted, high efficiency proximal speakers for a net reduction of sound production, escape and distance travel from CHS.

26

**Impact 10-2 "Nighttime Stadium Events... Two New Campus Parking Areas.... Traffic Control Measures Would Cause an Occasional Noise Increase"**

PROBLEM: Proposed Project, Level of Impact LTS (Less than Significant)

QUESTION: More Attendees = More Vehicle Trips = More Parking = More Noise = More Total Impacts (Significant). Why wasn't Traffic Noise measured, recorded and analyzed during recent Football games to estimate increased Noise

26  
cont.

Impacts? I'd like to know please.

CRITICISM: Disagree with LTS impact. More car, motorcycle, truck noise along with the addition of proposed shuttle bus trips between CMS and CHS equates to MORE VEHICLE NOISE along Scenic State Hwy 1, Carmel Valley Road and connecting roads, streets, drives and lanes plus internal road and parking lots... within previously quiet evening hours. SOLUTION / MITIGATION: Noise Measurements at Peak and Max reading times need to be factored by the increase in vehicles, more auto movement within CHS Campus (equal to the new total number of parking stalls - both existing and new) to estimate Noise Increase during previously quiet evening hours. Actual and relevant Noise data can be recorded at "real" locations (CHS and CMS) and factored by the increase in vehicle trips (to and from CHS; to and from CMS plus bus trips and bus idling to and from CHS). Do the work!

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**Impact 10-3 "Construction Activities Could Cause Substantial Temporary Noise Increase"**

PROBLEM: CHS is adjacent to residential land uses (on all four sides) and sits on a hill adjoining the historically quiet surrounding Carmel Area and City of Carmel. CRITICISM: Construction Noise Mitigation and Containment would be difficult. In otherwise quiet forested and mature neighborhoods where significant construction, grading projects and road building are not the norm, this would be a Significant Impact with a lengthy duration. QUESTION: Why is there NO plan or effort to CONTAIN CHS Campus generated NOISE at the school property perimeter... including construction? Please quantify how this would reduce Noise escaping into residential neighborhoods. I am requesting your data. SOLUTION / MITIGATION: Alternatives #1, #2, & #3 avoid all CHS construction noise and are preferred; #4 (CMS) is listed as LTSM / Greater Impact. Show us the science, rather than hoping optimistic construction industry equipment Noise levels applied to CHS' neighborhood will suffice. Play ball Saturdays. Honor Padre Tradition.

28

**Impact 10-5 "Existing Neighborhood Noise Associated with Students and Spectators Parking in Surrounding Neighborhoods..."**

PROBLEM: Some Parking may be "off" public right-of-ways but Plan would increase concentration of Noise Impacts radiating from elevated CHS property. CHS sits on a hill (overlooking neighboring "residential uses") - and thus internal traffic and additional parking lot Noise (engines revving, stereos blasting, doors, trunks and tail gates slamming, etc) would be louder and travel farther. Furthermore, legal questions remain concerning deployment of "No Event Parking" signs on public right-of-ways. QUESTION: This might be better for neighbors adjacent to CHS Campus and "under the sound horizon" but increases Noise bleed and reach to more "residential land uses and sensitive receptors" on near and farther out ridges. In particular ridge top properties were purchased by many for their coastal and ocean views, not knowing their property (and its value) may be negatively affected by Pool and Stadium Lights and Increased Noise projection from "the school on the hill". Why are there no buffers, deflectors or Noise Containment features listed in Proposed Parking, Construction and Internal Road building Plan? Wouldn't these measures help reduce Noise bleed and projection from Campus? Please tell me why this was entirely omitted and quantify how Noise Containment Plan and features would reduce Noise escaping from CHS. CRITICISM: More Parking gives rise to more car noises. Mitigation measures should include Noise absorbing and containing barriers: plants, bushes, shrubs and trees, improved fencing, berms, and sound enclosing walls. Alternative Transportation should be considered and strongly encouraged (ride the bus, car pool, bike riding, e-bike riding, walking). SOLUTION: Contain the Noise! Also nice to consider alternatives - bus riding incentives, carpooling incentives, (more) bike racks, e-bike charging stations, and physical education fitness credit and rewards for students who choose alternatives to driving to school - but realize none can be assured or required.

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**pg 374 ENVIRONMENTAL IMPACT ALTERNATIVES / NOISE (all LTS / Less Than Significant, NI / No Impact or LTSM / Less Than Significant w/ Mitigation)**

**Impact 10-1** Project-Generated Traffic Would Occasionally Increase Existing Noise Levels.  
**Impact 10-2** Nighttime Stadium Events, Activities Associated with Two New Campus Parking Areas, and Traffic Control Measures Would Cause an Occasional Noise Increase.  
**Impact 10-3** Construction Activities Could Cause a Substantial Temporary Noise Increases  
**Impact 10-5** Existing Neighborhood Noise Associated with Students and Spectators Parking in the Surrounding Neighborhoods Would Decrease with Construction of New Parking Areas and Implementation of the Traffic Management Plan  
PROBLEMS: ENVIRONMENTAL IMPACT ALTERNATIVES 10-1, 10-3, 10-3 and 10-5 all ignore the "time shift" of noise from afternoons 2:00 pm to 5:30 pm to more sensitive proposed 6:00 pm - 9:30 pm quiet time and continuing until spectators, players, coaches and staff have all departed various Parking Lots in their vehicles (by the hoped for 10 pm). CRITICISM: Labelling Impact Alternatives as LTS / Less Than Significant, NI / No Impact or LTSM / Less Than Significant



cont.

w/ Mitigation and avoiding all together affects of time shift from daytime to nighttime is disingenuous.

QUESTION: Why continue to ignore that shifting Noise, Traffic, Parking, Lighting and Safety Impacts to Nighttime increases their effects and creates a bigger problem with increased liability concerns? Is this a strategy to "hide" the facts? Do perform actual Noise Sampling and Recording for both days and time periods (above) and share actual facts. I'm counting on Trustees ordering both for completeness and transparency!

SOLUTION: Recalibrate. Scrap Improvement Plan altogether or Modify Proposal and Plan extensively to continue meeting the traditional needs of student athletes while addressing and resolving concerns of area neighbors and CUSD Constituents - including but not limited to buffering, blocking and containment of noise sources.

**10.4 ANALYSIS, IMPACTS AND MITIGATION MEASURES (text)**

**pg 269 Traffic Noise Impacts on Existing Noise-Sensitive Land**

**Impact 10-1 Project-Generated Traffic Noise Would Not Increase Existing Noise**

PROBLEM: [as stated in Plan] Average number of trips, surveyed vehicle occupancy, anticipated attendance projections, etc grossly distracts from underlying and overwhelming concerns.

CRITICISM: All stated "averages" "anticipated... projections" aside, Traffic Noise Impacts completely overlooks the change of Stadium use time - from day to night and is in no way equal or comparable. Overlooked (or hidden) is the Impact Increase from "no evening and night" games to nighttime "6-7 football games", 124+ other games and 400+ practices - including boys and girls soccer, lacrosse and field hockey.

QUESTION: Why were the Impact Increases of Traffic Noise on Sensitive Receptors in Residential Land use areas in Proposal and RDEIR not measured? This would be a more accurate comparison and highlight the truth about this change. Tell me when these measurements will be conducted and respond with the data.

SOLUTION / MITIGATION: "Therefore project-related increases" of auto trips and number of attendees would be better accommodated during daytime - as they are now. Avoid quiet dinner and evening hour sports events and practices to keep the peace in the greater Carmel Area.

**Impact 10-2 Nighttime Stadium Events Would Cause an Occasional Noise Increase**

PROBLEM: "The noise levels... cannot be precisely defined"... "no football games held at the stadium or within the surrounding area last year." "WJV Acoustics therefore reviewed noise level data previously collected for a different high school" [see 10-3 pg 270 above] and included in their Report evaluations and assumptions (not factual data gathered from the Proposed Project site).

CRITICISM / MITIGATION: Nice try. 10-2 needs a do over. This is NOT Less Than Significant. This Assessment and data extracted from another paid study is not Measurement and has no relevance. Carmel Highs unique topography, weather, atmospheric conditions and surrounding flora and fauna render this "Less Than Significant" Impact moot. It is Significant!

QUESTION: Now football is "back in session" at Carmel High, why haven't the District Trustees instructed the Facilities Director to hire a different contractor to do a Professional Noise Impact Study? This would clear up a lot of ambiguity and false impressions. Please share measurement methodology and data specific to CHS and Carmel Area.

SOLUTION / MITIGATION: Do the work and report actual findings - not interpretations, valuations, assumptions, extrapolations or other mystery pseudo-science.

**Impact 10-3 Construction Activities Could Cause a Substantial Temporary Noise Increase**

PROBLEM: "Construction activities associated with installation of stadium lights will be limited" and therefore Noise will be Less Than Significant.

CRITICISM: Not so. Construction Noise will be Significant for it's entire period. 10-3 completely overlooks Noise generated from expanded "construction activities" not detailed in this Section. Omitted are demolition of Tennis Courts (jack hammers); construction of two additional Parking Lots (graders, soil compactors); trimming and / or removal of protected Cypress and Pine Trees (chain saws); grading and paving Internal traffic aisle (cum roadway); driveway widening and improvement; installation of walkways and lighting; grading and construction of 2,400 sq. ft. building and related installations. This major RDEIR Plan Expansion with its Significant amount of Noise should trigger a complete START OVER and NEW BUDGET!

To wit: chain saws, audible safety signal devices, digging equipment, drilling equipment, jackhammers, road grading machines, paving machines, circular saws, percussive nail guns, cranes, material delivery and debris removal trucks, cement trucks, cement pumping equipment, etc. will all contribute to a "chorus" of Construction Activity Noise which (as stated) "will be confined from 7:00 am to 7:00 pm".

QUESTION: Why were the (above) Noise Sources and Noise Impacts not included in the RDEIR? Please explain and detail the broadened, increased and anticipated Noise from the expanded Proposed Plan and RDEIR. How it will this increased Noise Impact Carmel Area Neighbors? Measurements please. What increase of Traffic (construction equipment, material delivery, personnel, etc) to and from Carmel High is anticipated and what increase to overall Noise Levels and Impacts are anticipated? Looking forward to your answers.

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cont.

SOLUTION: This obvious Noise Impact should have been included in the RDEIR. When construction is greatly expanded, more Noise is generated and needs to be accounted for and reported to constituents. Change of Scope, Project and Plan changes and increased Noise likely will change Impact to Significant.

From Monterey County Building Department and County Noise Ordinance:  
"Plainly audible" means any sound that can be detected by a reasonable person of ordinary."  
and  
"The ordinance...applies to "any machine, mechanism, device, or contrivance" within 2,500 feet of any occupied dwelling unit. The ordinance limits the noise generated to 85 dBA at a distance of 50 feet from the noise source."

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**Impact 10-4 Construction Activities Could Cause Temporary Excessive Groundborne Vibration (Less Than Significant).**

PROBLEM: On or before Aug 25, 2022 when RDEIR was published, no evaluation, consideration or update was given to the above 10-3 and this 10-4 Section - relative to Noise and Vibration sources (vehicles, equipment, tools, safety and signaling devices and their operators) and their Impacts. See Section 10-3 (above).

CRITICISM: Groundborne Vibration (change) was not addressed in the RDEIR. In conjunction with 10-3, Groundborne Vibrations should be reevaluated and this Section rewritten.

QUESTION: Both concurrent and/or sequential construction activities and their individual (or combined) Noise and Vibration profiles for this expanded project need to be addressed and reported. What is the schedule and sequence for Construction Noise and Vibration and what are the Noise and Vibration increases (over ambient)? Values please.

SOLUTION: It's obvious that 10-4 Vibration needs an update and rewrite, based on current facts which should have been included in the RDEIR release Aug 25, 2022.

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**APPENDIX I**

**1. INTRODUCTION**

**Project Description**

PROBLEM: \$4.5M Lighting project has grown exponentially into the Stadium Improvement Plan- and without an approved and *published Budget*, - likely tens of times or more.

CRITICISM: What was (1st crack at DEIR) a Stadium Lighting Plan has morphed and multiplied into a complex multi-faceted Construction Plan - a Solution without a Problem... which does not benefit all students (boys and girls) equally.

QUESTION: What was the genesis of this mammoth change? Who came up with all these concepts (not a real Plan)? Now Trustees are contemplating not only FIELD LIGHTING, but construction of TWO NEW PARKING LOTS (one costing the SACRIFICE of our Championship Tennis Teams COURTS), INTERNAL ROADS connecting same with adjoining PEDESTRIAN WALKWAYS (dangerous) and a new 2400 SQ. FT. BUILDING! Oh, and replacement of exiting POOL LIGHTS publicly promised (by Superintendent Knight) to be done last Summer as proof that Dark Sky technology will contain light bleed from CHS into surrounding neighborhoods. Sheesh!

SOLUTION: Get back to basics. One step at a time. If the optimum wave of LED lighting is proven healthy for our Students and state-of-the-art emitters satisfactorily direct and contain light bleed within CHS Campus limits... then upgrade the Pool Lights (as promised prerequisite to moving forward with other "improvements". After which surface and prioritize the next perceived "need" and draw a comprehensive plan - based on what's good for Students and surrounding community (rather than assumption, theory or lighting industry rhetoric).

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**2 . THRESHOLDS OF SIGNIFICANCE**

**a. Would the Project result in generation of a substantial temporary or permanent increase in ambient Noise Levels in the vicinity...?**

PROBLEM: Yes ambient Noise Levels will increase - nearby and out to ridge tops and neighborhoods at higher elevation than CHS Stadium.

CRITICISM: Shift from Day to Night use, particularly Noisy Football games absolutely increases Noise Impacts and will lead to more complaints from us "sensitive receptors".

QUESTION: What measured increase will the shift of "Noise Impact Time" (from Saturday daytime to Friday evenings) and longer afternoon - early evening practices have?

SOLUTION: This needs to be researched, measured, quantified and reported.

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**MONTEREY COUNTY**

**Policy S-7-2: "Proposed development shall incorporate design elements necessary to minimize noise impacts on surrounding land uses...."**

PROBLEM: No physical noise containing or deflecting design elements are part of Proposed Plan.



cont. CRITICISM: Sound barriers: fences, walls, berms, deflectors and absorbers should be used to reduce Noise Escape from CHS.

QUESTION: [What Noise containment and buffering features and elements are part of \(or need to be included\) in this Proposed Plan?](#)

SOLUTION: Quantify and Report features and elements.

## GOAL S-7: MAINTAIN A HEALTHY AND QUIET ENVIRONMENT FREE FROM ANNOYING AND HARMFUL SOUNDS

**Policy S-7.1: New Noise Sensitive land uses may only be allowed in areas where existing and projected noise levels are “acceptable”...** see Table 1 Community Noise Exposure Levels, Monterey County: Sports Arenas, Outdoor Spectator Sports Noise Ranges - Conditionally Acceptable <75 dB; Normally Unacceptable 70+ dB Ldn or CNEL.

PROBLEM: Figure 9, pg 34 states recording for March 22, 2022 Site L-4 w recorded Lmax of 65 to 90 dBA from 14:00 to 15:30 hours.

CRITICISM: Maximum Noise escape from Stadium occurs during Football Games - which would have an even higher recorded Lmax (then above) and Leq. This was not measured at all.

QUESTION: [How can this singular Southerly, off hour \(no football game\) recording justify the maximum Noise \(LMax\) escaping in all directions from CHS? It can't.](#)

SOLUTION: More science needed. Perform Noise Measurements along CHS Fence Lines in all directions. Include in FEIR for all to see and Comment on.

### Policy S-7-7 ... “Noise Hazards Section of the Safety Element

PROBLEM: “Scenic State Highway 1 adjacent to CHS generates noise in excess of 60 dB CNEL.”

CRITICISM: “Roadway Noise in excess of 60 dBA, requires a site and project-specific impact Noise analysis.” Incomplete Acoustic Measurement (selective sampling) needs to be tossed out and comprehensive Measurements performed at agreed upon location and times.

QUESTION: [Was this Noise analysis done? Where is the report? Please send it to me.](#)

SOLUTION: Mitigation measures may include, but are not limited to sound walls... etc. This should be included in Proposed Plan.

### §10.60.030 - Monterey County Municipal Code: Operation of noise-producing devices restricted.

PROBLEM: “At any time of day... it is prohibited... to operate any machine, mechanism, device or contrivance which produces a Noise level exceeding 85 dBA measured 50 ft therefrom.”

CRITICISM: Amateur Noise monitoring using iPhone and Decibel X (NIOSH Standard) application at Stadium fence line (50 ft or more from playing field, home team stands and public address system speakers) has recorded Football Game Noise over 85 dBA)

QUESTION: [Why hasn't a professional environmental acoustic engineering firm measured, analyzed and reported Noise levels escaping the Sports Stadium during interscholastic Football game\(s\) at the fence line surrounding the Stadium?](#)

SOLUTION: This measurement should be done! Quantifying aggregate Noise 50 ft from its source will suggest containment and mitigation measures.

### §10-060.040 (c) Monterey County Municipal Code provides exemptions...”

PROBLEM: “this section shall not apply to: Outdoor gatherings... sporting and entertainment events...”

CRITICISM: Although County Code Noise standards provides exemptions for certain events, it would be wise to recognize the proximity, terrain, noise sources (which can be controlled) and adopt a “good neighbor” Noise Policy, resulting in a net reduction of Noise escaping from the CHS Campus - well within the County Code.

QUESTION: [What consideration have CUSD Trustees given to the benefit of adopting and adhering to a stricter Noise Maximum and Noise Peak Standard to benefit both Students \(hearing damage is cumulative\) and Constituents - near and far? If not, why not?](#)

SOLUTION: There is the letter of the code... and also its intent (not to disturb neighbors). The suggestions (posed in the question) would go a long way to easing neighbors concerns and be more neighborly.

## FEDERAL NOISE STANDARDS

### b. Construction Noise and Vibration

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

PROBLEM: “Construction shall occur only during times allowed by ordinance/code unless such limits are waived for public convenience.” This means 7:00 am to 7:00 pm

CRITICISM: 7:00 am to 7:00 pm includes the “dinner hours” 5:00 pm - 7:00 pm

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cont. QUESTION: Will CUSD specify that Project Plan Construction Noise will start at 8:00 (better for Students as indicated by Late Start) and halt at 5:00 pm (the end of the “business day” and beginning of the “dinner hours”)? I recommend doing so.  
SOLUTION: This Criticism is focused on the “sensitive hours” - from 7:00 am to 8:00 am and 5:00 pm to 10:00 - when Parking lots are cleared. As part of overall Noise Escape Management, Trustees could order Construction to begin at 8:00 am and halt at 5:00 pm.

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**3. SETTING**

**corrections:**

**paragraphs 1 & 2:** “...within the rural/suburban SCENIC State Route 1 corridor.

**paragraph 3:** “...placed on the SECOND lowest graded terrace (not the lowest, which would be the baseball field)

**a. Background Noise Level Measurements**

pp1 “... existing noise sources associated with various after school activities including sports practices and games....”

PROBLEM: In order to understand and evaluate Noise Impacts measurements have to be taken and analyzed.

CRITICISM: No measurement, recording or analysis of any CHS “after school activities” have been performed or reported, particularly the biggest Noise Impacts generated from league football games.

QUESTION: Why were these Measurements not included in RDEIR? Without them Plan is incomplete and therefore it's not possible to fully understand or Comment on Proposed Plan.

SOLUTION: Get the science done during the 22-23 football season (already 3 home games have been missed). Share the data!

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**Comments on Noise Measurements (by site):**

Site LT-1 (below and East of baseball field) located below the CHS property horizon; microphone shielded by surrounding shrubbery, brush & trees

Site LT-2 (below and South of Carmel High School Championship Tennis Courts) off Morris Dr, West and below tennis court elevation; trees and shrubs surrounding

Site LT-3 (below and East of Campus Pool and Parking elevation) off Flanders Dr, in grass, nestled amongst trees

Site LT-4 (South of Campus Tennis Courts and adjacent to walkway at chain link fence); not sure why this Site was included; primarily sited to measure Highway Noise, not representative of Noise Sampling from CHS Stadium sources.

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**4. PROJET IMPACTS**

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

PROBLEM: Hexagon Traffic Consultants estimated impacts based on a prior contract for another school property including vehicle counts and occupancy - *rather* than at Carmel High School.

CRITICISM: Using “pandemic conditions” as rational for “adopting” data from another school rather than collecting it is weak and speculative. The factoring and manipulation of this data and multiple assumptions should cause this report to be thrown out.

QUESTION: This is bad science (or no science at all). Taking this short cut short-changes the process and public. How does this benefit furtherance of this Plan?

SOLUTION: For a robust unimpeachable plan, scientific process must be adhered to. Since pandemic, actual observations, measurements and conclusions could have been conducted. Do the science - unique to CHS location with poor ingress and egress, lack of adequate pick up and drop off locations, local surface street and Scenic Highway traffic patterns and daily afternoon congestion.

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**b. Noise Impacts from New Parking Areas (Less Than Significant)**

**New Parking Lots**

PROBLEM: Again, theoretical concepts and expectations do not lead to conclusive defensible data. In addition to significant noise increases (number of cars, number of occupants, new parking lot locations), new vehicle noises and noise bleed and the shift to Nighttime Football, Pool use and other sports contests will increase cumulative Noise Impacts during otherwise “quiet” evening hours. Add to this nighttime vehicle movement Noise the moving vehicle lights escaping from CHS and shining in all directions towards “residential uses” - both near and far.

CRITICISM: Noise measurement, recordation and analysis (for envisioned Parking Lots) is possible with some creative planning.

QUESTION: Why have Trustees not ordered measurement of escaping vehicle Noise at the East side (back) of CHS and reverberating along the driveway adjacent to the Performing Arts Center during present peak use times: mornings (when school buses park an idle with flashing lights) and parking lots fill and afternoons when they empty?

SOLUTION: Science please.

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**Traffic Control Measures, Off-Campus Parking, Shuttle Service, Alternative Mode Encouragement, On-Site Amenities, On-Campus Supervision, Parking Management**

cont

PROBLEMS: Off Campus parking at Middle School presents presents a host of additional problems (security, supervision, busing); Visiting Spectators will not know in advance where to park; compliance with encouraged Off-Campus Parking will be low, change away from traditional Pick Up / Drop Off location and protocol and will cause several unintended consequences (parking in residential neighborhoods West of Scenic Highway 1, increased pedestrian traffic along residential streets including Ocean Ave, no safe walkways on either side of State Scenic Highway 1 (drainage ditches), potential for both dangerous pedestrian street and Highway crossings... all after dark. This will also increase Noise and Parking on streets not heretofore a problem and anger additional home owners.

CRITICISMS: Lot of wishful thinking... no realistic Plans or control points. Do we really think CHS Students will be happy about *moving* their cars, *leaving* them and *riding* a shuttle bus from designated parking at Middle School? They gave up riding the bus when they got a car! Narrow internal roadways with adjoining pedestrian walkways, Parking Lot ingress and egress danger and traffic backups (Morris Dr, Ocean Ave, North Carmel Hills Dr and Flanders Dr) will all get worse.

QUESTIONS: What durable Agreements are in place to provide Parking Enforcement? What legal liability and moral responsibility is the Board of Education, our Individual Trustees, Superintendent, Facility Director, Principal, Athletic Director, Coaches and Staff willing to accept for nighttime traffic and pedestrian accidents result of these wishfully concocted concepts? All for Friday Night under the Lights? Pray tell.

SOLUTION: Ahem... Tradition of Padre Football is on Saturdays. Allocate monies for other projects supporting both boys and girls sports, busing to other venues for team events and enhanced programs supporting academic excellence.

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**c. Noise Impacts from Stadium Events (Less Than Significant) Football Games (and other stadium events)**

PROBLEM: Analysis is not measurement. "noise occurring during nighttime hours (10 pm to 7 am)"; "Noise levels associated with football games... would typically be limited to up to six (6) home games per year. As such noise would occur very infrequently."

CRITICISM: Mineral King Bowl hocus-pocus is absolutely not relevant. Constituents (CHS' Neighbors) ARE concerned with NEW and INCREASED Noise Impacts from 5 pm to 10 pm. Mere mentioning of "up to 6 home games" is disingenuous, false and misleading. There is no mention of late practices, other sports or non-sports use after dark that would generate Noise Increases in excess of current Evening Ambient Levels. District does not exclude Facilitron Rental to other schools, businesses or concerns for evening time / nighttime after dark use.

QUESTION: What are the real numbers for: Evening (5 pm on) and Nighttime (after dark) Practices, Meets, Matches, Games and other uses - including Rental? Do the math, publish and report back.

SOLUTION: Again do the science, be transparent and earn our trust... or simply stay the course with near 80 year tradition of Saturday Padre Play and practice schedules that have worked for decades. Cost: Not much. Quit this boondoggle before Trustees spend more tax payer money on Staff and overhead expense, outside Consultants and CPRA requests (contrary to statements made by Superintendent and printed in both general and student newspapers, these requests do not divert funds from Student programs).

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**d. Noise from Construction (Less Than Significant) & e. Vibration Impacts (LTS)**

PROBLEM: "construction Including required demolition activities would likely occur in 2023 between approximately June through October... Construction Noise is typically not considered to be a significant impact if construction is limited to daytime hours... however it is typical to limit construction activities to the hours of (at a minimum) 7:00 am to 7:00 pm."

CRITICISM: Industry standards for "Typical Construction Equipment Maximum Noise Levels, dBA" and "Typical Vibration Levels During Construction" are without regard to the unique location, elevation (on a hill) and Noise disbursement and travel to both near and far "residential uses" and "sensitive receptors".

QUESTION: Without regard to County Noise Ordinances (and their permissible time periods), wouldn't it be very smart to truncate Construction and its elevated Noise Impacts to the hours of 8:00 am to 5:00 pm? This would be in keeping with the quiet (35-45 dBA) of surrounding and distant neighborhoods and out of respect for us "sensitive receptors" (your Constituents).

SOLUTION: If this Plan has a prayer of moving forward, this would contribute to it!

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**5. IMPACT SUMMARY - Less Than Significant**

PROBLEM: "Project-related increases in traffic noise exposure would not exceed any Monterey County noise standards..." and "...noise levels associated with stadium events (football games), new parking lot ares and stadium storage building would not be expected to result in noise levels exceeding any Monterey County noise level standards or existing (without project) ambient noise levels at nearby noise-sensitive land uses."

"While some noise associated with the cheering of crowds, band performances and half-time events would expected to be audible during some events at nearby residential land uses, such events would be extremely limited in both duration and frequency. Noise levels associated with evening football games would generally be limited to a few evening hours during each event would typically be limited to up to six (6) home games per year. As such, associated noise would occur very infrequently."

CRITICISM: This "porked up plan" erroneously "suggests" that football games are the only source of Stadium Noise. This Summary and RDEIR "conveniently" omits mention of other Noise sources and Impacts emanating from late afternoon

con't.

and evening practices (for other Team Sports) and wrongly suggests that Noise Impacts would be Less Than Significant.

QUESTIONS:

1. What other deficiencies in Noise Measurement, Recording and Reporting can be rectified?
2. What steps can Trustees take (or order) to be fully transparent in your dealings, thorough in your examination and considerate of close-in and farther-away Carmel area neighbors?
3. What would it take to update analysis and currently weigh viable Alternatives to this RDEIR (there are several - like building a nice Stadium at the East end of CMS Campus)?
4. This Proposal and Plan initially had several deficiencies and omissions (some were rectified). Has it become too complicated, too burdensome and too expensive to "fix" in order to achieve a balanced outcome for both CHS and Neighboring Constituents needs?

SOLUTION: Toss out "selective" and "favorable" Short-Term and Long-Term Noise Reporting. START OVER. Identify, count and include all late afternoon practices, scrimmages, league games and other Noise producing Stadium uses and hire *another* environmental acoustic engineering firm to monitor Noise Levels and Report Data for same. Emphasis should be placed on data comparisons of Ambient (low levels) and Peak and Maximum Noise Levels (high levels) plainly identifying Increases. Although Noise Levels may fall within County Ordinances, be respectful and considerate of Carmel Area Residents. Ask Constituents / Neighbors / Residents for their suggested locations to place Noise Monitoring Equipment surrounding and at the same elevation as CHS and also at a wider distances and at elevated locations (on ridges and line-of-sight positions) adjacent to residential land uses. Residents know our neighborhoods better than hired-out "experts". Sampling and Noise Data Recording should be done during traditionally quiet hours of 5:00 pm - 10:00 pm and also during "maximum noise production hours" (ie well attended Saturday Football games 2:00 pm to 5:00 pm) for realistic comparison.

IF THIS CAN'T BE DONE (as well as fixing all the other shortcomings, errors and deficiencies of this RDEIR), ABANDON THE PLAN. START AFRESH WITH HELP AND SUPPORT FROM YOUR COMMUNITY!

Sincerely,  
Larry Arthur





**CARMEL  
PADRES**

**TENNIS**

1961 1962 1963 1964 1976  
1978 1982 1986 1987 1993  
2009 2011 2012 2013 2014  
2016

85.0 DB

DURATION: 2M:4S

AVG: 78.6  
MIN: 60.1  
MAX: 96.0  
PEAK: 101.0



2:50 PM

SATURDAY, SEPTEMBER 17, 2022

#DecibelX

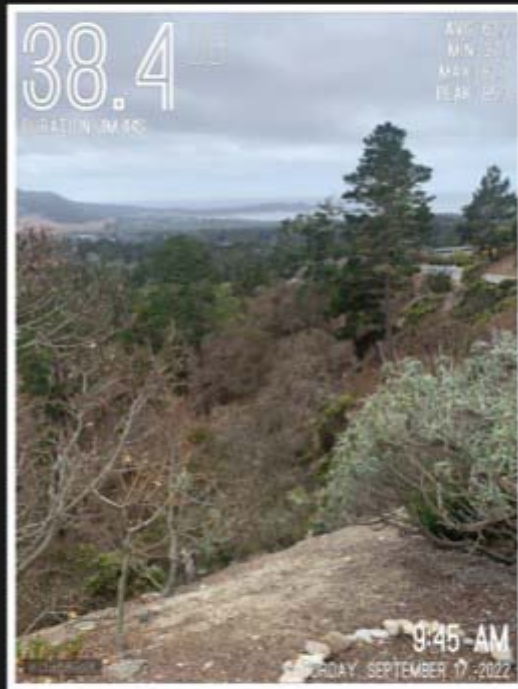


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5G

Close

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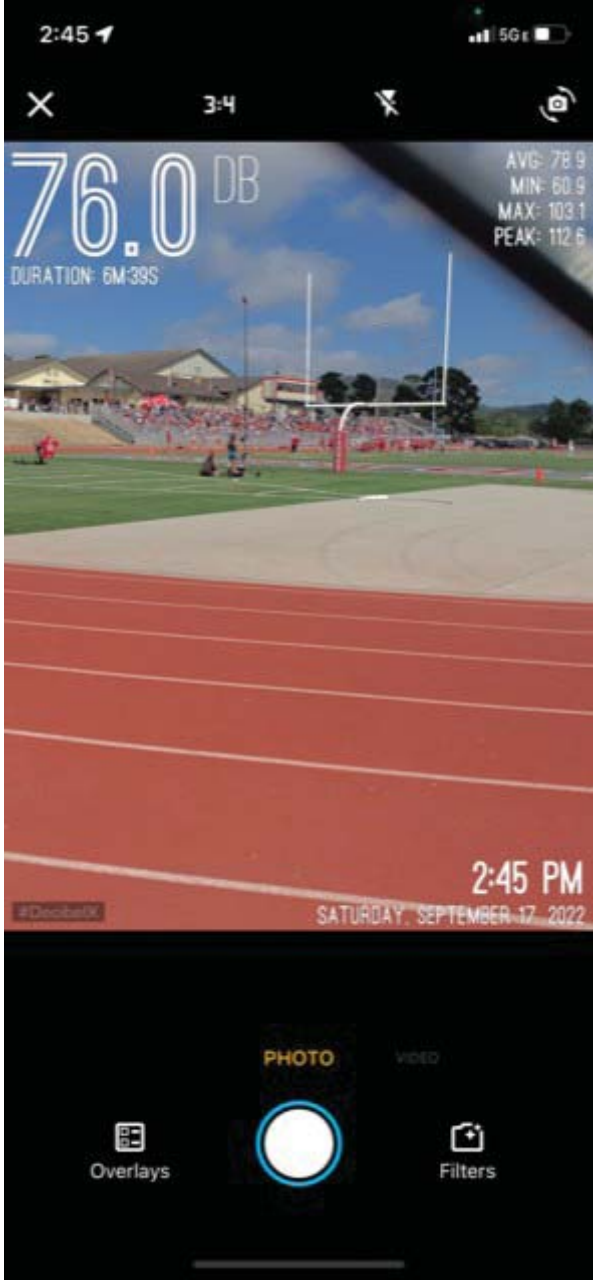


MAX: 96.0  
PEAK: 101.0

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DURATION: 3M:39S

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36.5 DB468

DURATION: 18S





## Response to Letter 58b, Larry Arthur

1. This comment is an introduction to the letter and expresses concerns with the size of the RDEIR, assumptions about conclusions, dialog with Trustees, the California Public Records Act, the increased size of the proposed project, and general opposition to the project. It does not raise a specific environmental issue that is not detailed in the comments that follow. A decision on the project's merits will be made by the Board, who will consider all comments. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. No response is necessary. No changes to the RDEIR are required.
2. This comment is about existing noise at the high school, and how some of that noise would be shifted to the evening hours. This issue is addressed in Section 10.0, Noise. See also response to Letter 2b, comment 3. No changes to the RDEIR are required.
3. This comment is about the Civic Center Act and limiting the use of the stadium at night. See response to Letter 14-3-h, comment 2, and Letter 29a, comment 6. No changes to the RDEIR are required.
4. Noise level measurements conducted with an iPhone app may not be properly calibrated, may have the incorrect weighting applied and do not include features such as windscreens to avoid environmental effects on measured levels.

The first point to discuss here is that the “peak” sound level should not be used when discussing measured noise levels in an environmental setting. Maximum ( $L_{max}$ ) would be the correct metric when discussing “maximum” noise levels in an environmental setting. Furthermore, A-weighted noise levels should always be used.

Any noise level measured to be 80.5-83.5 dB taken a mile from campus was not the result of any noise source generated on the Carmel High School campus.

It's not clear what the commenter means about the inclusions of “geographic locations out to the limit of human perceived noise impacts.” When determining the noise levels associated with a proposed project, including the measurements of the noise source(s) in question, the further from the source(s) the greater likelihood that the noise measurements would measure extraneous/unrelated noise sources. In determining a project's compliance with noise standards, the analysis focuses on the closest receptors to the source first. With very little exception, noise impacts are most likely to occur at receptors closest to the noise sources. Therefore, by demonstrating compliance with the closest sensitive-receptors to a noise source, it can reasonably be determined that sensitive receptors located at greater distances would also not be impacted.

WJV Acoustics did numerous spot-measurements throughout the residential areas surrounding the Carmel High School stadium, during a football game, in the supplemental noise analysis (refer to response to Letter 2b, comment 3 and Appendix A of this final EIR). Noise levels associated with the game on October 1, 2022 at Carmel High School were generally not audible throughout the neighborhoods. In locations where game-related noise was audible (vicinity of ambient noise measurements sites LT-1 through LT-4) the noise levels measured during the game were not statistically different from noise levels measured during the same hour, when no game was occurring. It should be noted, noise levels measured at site LT-3 (G-1) during both the 24-hour period when there was no football game (46 dB  $L_{dn}$ ) and the 24-hour period that included a football game (45 dB  $L_{dn}$ ), were both well below the noise exposure level considered “normally acceptable” by Monterey County for residential land uses (60 dB  $L_{dn}$ ). Ambient noise measurement site LT-3 (G-1) was located at the same elevational grade with the stadium (where no topographical acoustic shielding occurred) and represents the closest residential receptor to the football game/stadium. Stadium-related noise levels at all other residential land uses in the project vicinity would be expected to be lower than those measured at ambient site LT-3 (G-1).

Noise levels measured at the remaining measurement sites, throughout the residential areas near the stadium, showed no statistical increase in noise during the football game as compared to noise levels measured during the same hour, when a football game was not occurring. Furthermore, while Monterey County does not have any specific daytime noise level standards for stationary noise sources, they do provide acceptable levels of community noise exposure for specific land uses. The county considers a noise exposure of less than 60 dB  $L_{dn}$  to be “normally acceptable” for residential land uses. While noise levels at site LT-3 were slightly higher during the game time window than during the same hours on a non-game day, the overall noise exposure (as defined by the  $L_{dn}$  metric) did not increase during the day of the game. The measured 24-hour noise exposure level at site LT-3 during the October 1, 2022 game day, was measured to be 46 dB  $L_{dn}$ , well below the County’s 60 dB  $L_{dn}$  “normally acceptable” noise exposure level for residential land uses.

The supplemental analysis (Appendix A of this final EIR), confirmed the findings of the noise analysis conducted for the RDEIR. No changes to the RDEIR are required.

5. This comment is about Saturday football games, budgets, recommendations for other physical improvements, and the Sunshine Protection Act. None of these comments raise an environmental issue and therefore, no response is necessary. No changes to the RDEIR are required. Please also see responses to Letter 14-2-w, comment 4, and Letter 2b, comment 5.

This comment also raises the issues of sampling noise data and visual impacts. Regarding sampling noise data, see response to 4 above. Regarding visual impacts, see Section 5.0, Aesthetics, of the RDEIR.

Additionally, the commenter expresses his preference for Alternative 1 or 2. A decision on the project's merits will be made by the Board, who will consider all comments.

6. Regarding the calendar for games and practice lighting, see Table 4-3, Proposed Stadium and Pool Facility Lighting Schedule, in the RDEIR. It includes the month and number of days, as well as start time and ending times for lighting associated with the stadium, as well as the pool. The pool lighting schedule does not change with implementation of the proposed project. Please also see responses to Letter 29a, comment 6, and Letter 14-3-h, comment 2. No changes to the RDEIR are required.
7. This comment is regarding construction noise. Construction noise is addressed in Section 10.0, Noise, in the RDEIR and includes a mitigation measure, which is standard in many jurisdictions, limiting the hours of construction. No changes to the RDEIR are required.
8. This comment is regarding taking noise measurements on a game day. As presented in comment to response number 4 above, this was accomplished, and confirmed the analysis and conclusions reached in the RDEIR. See response to comment 4 above. No changes to the RDEIR are required.
9. This comment is regarding taking noise measurements on a game day. See response to comment 4 and comment 8, above. No changes to the RDEIR are required.
10. Noise levels measured at site LT-3 (described as site G-1 in Appendix A of this final EIR) were not “below the horizon” or “lower than the stadium”. This measurement site is essentially at the same elevational grade as the stadium, and no acoustic shielding is provided by the topography. Noise levels measured at this site were slightly higher during the game than during the same hours, measured during a non-game day, but remained well below the 60 dB  $L_{dn}$  exposure level determined to be “normally acceptable” (measured to be 46 dB  $L_{dn}$  during the October 1, 2022 game day) by Monterey County, for residential land uses. During the game time hours, noise levels at site LT-3 were measured to be approximately 49 dB  $L_{eq}$  and 61 dB  $L_{max}$ . A measured noise level of 49 dB  $L_{eq}$  should be considered low for residential areas. Monterey County does not have a daytime  $L_{eq}$  noise standard, but rather has a 45 dB  $L_{eq}$  nighttime noise level standard. Generally speaking, daytime noise level standards are 5-10 dB higher than nighttime noise level standards. Regarding the specific “solution/mitigation” comment, this was done with the supplemental analysis in Appendix A of this final EIR. Please also see responses to Letter 2b, comment 4, and Letter 11b, comment 16. No changes to the RDEIR are required.

11. This comment is about taking noise measurements “farther afield.” Measuring ambient noise levels at distances up to a mile away from the stadium, for a project of this scope, is not necessary. This assessment was based on an understanding by WJV Acoustics staff of noise levels associated with stadium activities and the distance it could possibly be audible and measurable. This was verified by the noise measurements collected during the October 1, 2022 football game by WJV Acoustics (see Appendix A of this final EIR) where at fairly short distances from the stadium (as in 600+ feet) the noise levels, while still audible at times, do not result in any measurable increases over existing ambient noise levels. Once one moves out to distances beyond that one increasingly cannot hear stadium activities. At a distance as far as one mile away there is very little chance that stadium noise would be audible. Additionally, as stated in response to comment 4 above, noise levels associated with stadium activities would not be measurable at distances such as a mile from the stadium. No changes to the RDEIR are required.
12. Based upon the findings of the environmental noise assessment as well as the gameday noise measurements (specifically in the vicinity of LT-3/G-1), indicate that any temporal increases in measurable noise levels would be limited to distances of approximately 600 feet from the stadium, when measured at locations not affected by topographical shielding (i.e., not “below the horizon” or “lower than the stadium”). Consequently, noise impacts to certain animal species (including Red-Legged Frog) would be significantly limited if not within the 600-foot area around the stadium where noise levels would be measurable during stadium activities. No changes to the RDEIR are required.
13. As demonstrated in Appendix A of this final EIR, specifically at monitoring site LT-3/G-1, noise levels during game hours were approximately up 6 dB  $L_{eq}$  (43 dB to 49 dB) and up approximately 1 dB  $L_{max}$  (60 dB to 61 dB) compared to the same hours during a non-gameday. As described above, this measurement site was at the same elevational grade as the stadium, with no topographical acoustic shielding. Subtracting 43 db (non-gameday hourly noise level) from 49 dB (gameday hourly noise levels) results in a noise level of 48 dB. This can reasonably be attributed to game day activities. The LT-3/G-1 was located at setback distance of approximately 300 feet from the stadium. Therefore, at setback distance of approximately 300 feet from the stadium, game-related noise levels would be expected to be approximately 48 dB  $L_{eq}$ . These levels would attenuate at approximately 4.5-6 dB/doubling of distance. No changes to the RDEIR are required.
14. No residential areas in or around the stadium (with the possible exception of residential land uses immediately adjacent to SR 1) would fall into the “normally unacceptable” noise exposure category (55-70 dB  $L_{dn}$ /CNEL). Furthermore, measures such as a wood fence, vegetation, or other ground level treatments, would not provide any measurable noise attenuation. No changes to the RDEIR are required.

15. There is no sensitive receptor location where noise levels go from 35 dB (no game) to 83 dB, anywhere. Please also see responses to Letter 2b, comment 4, and Letter 11b, comment 16. No changes to the RDEIR are required.
16. At no point during a game do noise levels reach levels even remotely approaching 85 dB at the location(s) of sensitive receptors. As previously stated, the “peak” noise level data is not a metric one would be looking at for a community noise level scenario. Maximum and peak noise level are not the same thing and generally the “peak” is not something that is considered when assessing community noise level issues. When assessing community noise levels, one would look at maximum ( $L_{max}$ ),  $L_{eq}$ , and time-weighted metrics such as the  $L_{dn}$ /CNEL. The iPhone app noise level measurement pictured was clearly taken essentially in the stadium. There are no sensitive receptors located within such close proximity to where this “measurement” was conducted. Furthermore, the location from which this photo was taken is approximately 150 feet from State Route 1, so it is hard to determine what the dominant sources of noise are at that location, but certainly vehicle traffic would likely be a large component of the noise environment at that location (near the existing tennis courts). As a frame of reference, some examples of noise sources/levels that would be similar to 85 dB: garbage disposal, dishwasher, average factory, freight train (at 15 meters); car wash at 20 ft (89 dB); propeller plane flyover at 1000 ft (88 dB); diesel truck 40 mph at 50 ft (84 dB); diesel train at 45 mph at 100 ft (83 dB); food blender (88 dB); milling machine (85 dB); and garbage disposal (80 dB). Please also see responses to Letter 2b, comment 4, Letter 11b, comment 16, and Letter 14-1-u, comment 1. No changes to the RDEIR are required.
17. Noise levels were measured at receptor locations west of State Route 1 (see ST-2 and ST-6 of the environmental noise assessment in Appendix I of the RDEIR). Furthermore, noise levels were measured at two locations west of State Route 1, during the gameday noise measurements (S-5 and S-6 in Appendix A of this final EIR). As described in Appendix A, noise levels associated with game activities at these two sites were not measurable (and generally not audible) over existing ambient noise levels, dominated by traffic on State Route 1. No changes to the RDEIR are required.
18. The California building code interior noise level standard of 45 dB  $L_{eq}$ , cited in this comment, assumes all doors and windows to be closed, for sound insulation purposes. No changes to the RDEIR are required.
19. The noise study was conducted based upon science in accordance with industry standards. The sentence partially quoted in this comment contains the following end of the sentence “...in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.” The project would not result in noise levels in excess of any established standards. No changes to the RDEIR are required.

20. See response to comment 4 above. No changes to the RDEIR are required.
21. See response to comment 4 above. No changes to the RDEIR are required.
22. See response to comment 4 above. Please also refer to Section 3.0, Environmental Setting, of the RDEIR. No changes to the RDEIR are required.
23. Noise level measurements described for vehicle movements and parking lot activities were acquired from actual vehicle movements and parking lot noise level measurements. These noise levels are not expectations or approximations, they are based upon actual noise level measurements. No changes to the RDEIR are required.
24. This comment is about traffic management. Mitigation Measure 11-4 in the RDEIR requires the school district to prepare and implement a traffic management plan. A draft traffic management plan is included as Appendix K of the RDEIR. No changes to the RDEIR are required.
25. This comment is about project-generate traffic. Project-generated traffic is addressed in Section 11.0, of the RDEIR, and in the supplemental noise analysis in Appendix A of this final EIR. No changes to the RDEIR are required.
26. The overall increase in project-related trips compared to existing traffic volumes is considered negligible. As a point of reference, a doubling in traffic volumes would result in a 3 dB increase in noise levels. The project-related increases in traffic were extremely low, and resulted in no measurable increase in traffic noise, over existing traffic noise in the project vicinity. Project-generated traffic is addressed in Section 11.0, of the RDEIR, and in the supplemental noise analysis in Appendix A of this final EIR. Please also see response to comment 4, above. No changes to the RDEIR are required.
27. This comment is about construction noise. See response to comment 7 above. No changes to the RDEIR are required.
28. This comment is about noise barriers. A noise barrier is most effective when located close to the noise source of the noise receptor, and the effectiveness is dependent on the noise source as well. In situations like parking lot noise, game-related sources, etc. that are not located at one specific location, the use of noise barrier is not effective. Furthermore, noise levels associated with game activities (see Appendix A of this final EIR) did not result in any substantial increase in noise levels over existing (non-gameday noise levels) and therefore any such noise barriers are simply not necessary and would not provide any measurable attenuation. Likewise, studies have shown that vegetation is not an effective noise barrier and should not be implemented as such. According to WJV Acoustics staff, no noise consultant would recommend vegetation as an effective noise barrier nor claim vegetation to



be an effective mitigation measure. It could be used as an effort to be neighborly or provide some visual barrier, etc. but not as a specific effective mitigation measure to address an actual noise impact (when mitigation is actually needed). As noted in a 2011 USDA article, “The noise buffer must completely block the line of sight. If any light can be seen through the buffer, it is providing no appreciable noise reduction. When only trees and shrubs are used for the buffer, this means the planting must be at least 100 feet wide with evergreen species for year around reduction. Even with wide and dense vegetative buffers noise reduction above 3 to 5 dBA is not likely” (see USDA article here: <https://www.fs.usda.gov/nac/assets/documents/agroforestrynotes/an42w05.pdf>). No changes to the RDEIR are required.

29. This comment is about various noise impacts and the time shift in the existing noise during the day, versus proposed noise at night, which are addressed in Section 10.0, Noise, of the RDEIR, and in the supplemental noise analysis in Appendix A of this final EIR. No changes to the RDEIR are required.
30. For purposes of noise analysis, nighttime is considered 10 pm to 7 am. Sporting events and practices would conclude prior to 10 pm. Please refer to Section 4.0, Project Description, of the RDEIR. Therefore, there would not be a shift of vehicle trips from daytime to nighttime hours, although they would be shifted to the evening hours. Furthermore, the original environmental noise assessment (Appendix I in the RDEIR) did analyze increases in traffic noise exposure in residential areas. In fact, the analysis assumed all project-related traffic would be applied to each roadway entirely, and was analyzed as to reflect the worst-case assessment. No changes to the RDEIR are required.
31. See response to comment 4 above. No changes to the RDEIR are required.
32. The original environmental noise assessment (Appendix I in the RDEIR) evaluated the proposed project’s construction impacts. See response to comment 7 above. No changes to the RDEIR are required.
33. Regarding groundborne vibration impacts, see Section 10.0, Noise of the RDEIR, starting on page 10-15. No changes to the RDEIR are required.
34. This comment is regarding the project description. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. It does not raise an environmental issue and therefore, no response is necessary.
35. Regarding the temporary and permanent noise increases, see Section 10.0, Noise, of the RDEIR, and in the supplemental noise analysis in Appendix A of this final EIR. No changes to the RDEIR are required.

36. Regarding noise mitigation, it is not necessary as the proposed project would not result in a significant noise impact. Please refer to Section 10.0, Noise, of the RDEIR for further analysis. Mitigation measures are only required when there is a significant impact. (Pub. Res. Code, §§21002.1(a) & 21100(b)(3); CEQA Guidelines, §15126.4.) No changes to the RDEIR are required.
37. See response to comment 4 above. No changes to the RDEIR are required.
38. This comment is about State Route 1 traffic “roadway noise” impacts. It does not include a comment on the proposed project or the RDEIR. Therefore, no response is necessary.
39. This comment is about taking noise measurements during a game. See response to comment 4 above. No changes to the RDEIR are required.
40. This comment is not about the proposed project and therefore, no response is necessary.
41. This comment is about construction noise. See response to comment 7 above.
42. This comment is about taking noise measurements during a game. See response to comment 4 above. No changes to the RDEIR are required.
43. This comment states where the noise measurements were taken for the RDEIR. No comment or question is provided and therefore, no response is necessary. No changes to the RDEIR are required.
44. This comment is about the VMT Assessment and Intersection Operations, Site Access and Parking Evaluation for the proposed project by Hexagon Transportation Consultants. See Section 11.0, Transportation and Parking, and Appendix J of the RDEIR for the complete methodology for estimating persons per vehicle for the proposed project. No changes to the RDEIR are required.
45. The discussion of parking lot noise is based upon actual noise measurements, not on theoretical concepts and expectations. See Section 10.0, Noise, in the RDEIR. No changes to the RDEIR are required.
46. The commenter expresses concern about the mitigation measure providing shuttle buses to and from the middle school for the high attendance games at the high school. No environmental issues are raised and therefore, no response is necessary.
47. See response to comment 4 above, and response to Letter 2b, comment 3 regarding noise measurements. Please also refer to Table 4-2 and Table 4-3 of the RDEIR, and response to Letter 2b, comment 2.

48. Regarding limiting the time for construction, see response to comment 7 above. Please also see responses to Letter 2b, comment 4, and Letter 11b, comment 16.
49. Football games were used for the noise analysis as they are the highest attended games at the high school. Therefore, the noise analysis used the “worst-case” scenario and concluded that the impact would not be significant. Therefore, if the worst-case scenario is not significant, then all of the other events would not be significant. For a discussion of project alternatives, please refer to Section 14.0, Alternatives, of the RDEIR, including Alternative 4.

On Fri, Sep 30, 2022 at 3:20 PM beth [ccege.com](mailto:beth@ccege.com) <[beth@ccege.com](mailto:beth@ccege.com)> wrote:

**To: Carmel Unified School District**

**From: Conrad Ege Class of 1951**

1 | I love the unique beauty and tranquility of Carmel, and am against the installation of 80-foot light towers at the Carmel High School stadium that sits just across Highway 1 from the town of Carmel-by-the-Sea.

What you are doing now will forever change the amazing Carmel coastline for the worse. Do not let this be your legacy! Instead, show you care about the community and the environment and end this terrible project.

I cannot believe that you are even considering installing lights. I hope it isn't for the money. What a shame that would be to sell out the beauty we have here for mere greed. Having lights will not improve anyone's quality of life. Just the opposite.

## Response to Letter 59, Conrad Ege

1. The commenter expresses their opposition to the proposed project but does not comment on the RDEIR. Therefore, no response is necessary. A decision on the proposed projects merits will be made by the Board, who will consider all comments.

On Fri, Sep 30, 2022 at 5:47 PM Lily Hills <[lilyhills@sbcglobal.net](mailto:lilyhills@sbcglobal.net)> wrote:

To whom it may concern.

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There are very few places in the world as special as Carmel... quiet clean and very low light pollution.  
If we don't protect these rare jewels... it will be a crime.

I am against the new night time lights for this reason.

Thank you  
Elizabeth Hills



## Response to Letter 60a, Elizabeth Hills

1. The commenter expresses their opposition to the proposed project and specifically notes their concerns regarding light pollution as a result of the project. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR. No changes to the RDEIR are required.

From: **Elizabeth Hills** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> Date:  
Tue, Oct 4, 2022 at 4:43 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1 I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.

2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.

3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_lrzqQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_lrzqQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded



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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
  - ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
  - iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.
- a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Elizabeth Hills

[LilyHills@sbcglobal.net](mailto:LilyHills@sbcglobal.net)

Carmel, California 93923

## Response to Letter 60b, Elizabeth Hills


1. See response to Letter 2b.

1 On Fri, Sep 30, 2022 at 4:12 PM Canyon Haverfield <[canyon73@gmail.com](mailto:canyon73@gmail.com)> wrote:

I am against the CHS lights because of the extensive traffic, noise and light pollution it will bring.

[PROVIDE SPECIFIC CONCERNS HERE]

[PROVIDE YOUR FULL NAME AND PHONE NUMBER]

By the way..in your by-line above you've misspelled intensive 

And yes the plan is inappropriate for this location..

Sincerely Steve Johnson

Lifelong resident since 1972.

## Response to Comment 61, Steve Johnson

1. The commenter expresses their opposition to the proposed project and specifically notes their concerns regarding traffic, noise, and light pollution. Traffic impacts are addressed in Section 11.0, Transportation and Parking, of the RDEIR. Noise impacts are addressed in Section 10.0, Noise, of the RDEIR. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR.

On Fri, Sep 30, 2022 at 8:59 AM Barry Kilzer <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> wrote:

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1 I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet RDEIR still allows up to 400 practices and 124 games at night and also fails to perform a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.



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5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm (see pic here) and Outlook Dr at

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6:21pm (see pic here).

a. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

b. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyqkOWRp60fDM\\_IrZgQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyqkOWRp60fDM_IrZgQMfTarGEWSS2/view?usp=sharing)

c. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pIL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 124 games each year that will use the lights. This is practically every day of the school year, so additional mitigations are not just needed but absolutely critical to preserving the scenic vistas and visual character of Carmel:

a. Disallow lights usage on weekends for any use, period.

b. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR does propose a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say, and overrule if necessary, for any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

a. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

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A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR is incorrect and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

a. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

b. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. RDEIR dismisses noise as a significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This has been seen already during current Saturday afternoon football games (see pic here). As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

a. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

D. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate local regulations. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them even if it has the authority to do so.

A. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

B. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this this Monterey County regulation?

a. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

b. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing>

C. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to meet all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be corrected to show that its impacts on both traffic and light will be significant lower than at CHS.

a. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (more cars than on Carmel Valley Road) and residential neighborhood (more homes than around CMS).

b. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >420-ft. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce all of the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Barry Kilzer

[kilzerwealth@gmail.com](mailto:kilzerwealth@gmail.com)

33 West Garzas Road

Carmel Valley, California 93924

## Response to Comment 62, Barry Kilzer

1. See response to Letter 2b.



**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding **your** Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR include significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



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**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - Updating required school area warning signage
  - Consider posted speed reductions down to 15 MPH in school areas
  - Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps
  - Exploring additional stop sign controls at intersection
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.



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cont.

**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

THOMAS COWEN *Thomas Cowen*

NAME: MEREDITH STRICKER *Meredith Stricker*

DATE: 29 Sept 2022

CONTACT INFORMATION: 3830 Whitman Carmel CA 93923

## Response to Letter 63a, Meredith Stricker & Thomas Cowen

1. See response to Letter 2c and Letter 33.

**Additional reasons to choose an alternative to the stadium lights and expansion at Carmel High School**

- 1 | **1. CUSD SHOULD HONOR ITS PROMISES** When we met several years ago at CUSD offices with former Superintendent Biasotti, he told us that the original deed selling land for the athletic fields required that no stadium lights would be added, because of the kind of negative impact shown in current the REIR. Where is the original deed? If there is no deed, why were we told of it? Does the District honor its its word and its promises? And how does this expose taxpayers to risk of future litigation?
  
- 2 | **2. YOU HAVE A CONFLICT OF INTEREST WITH MUSCO PROVIDING BOTH DESIGN AND PRODUCT** which limits design options to their inventory and their narrow expertise which only applies to Musco products. In the past, we worked with CUSD officials to hire independent lighting consultants. **The larger scope of this project requires independent lighting consultant/designers** who can design a lower-impact lighting package with multiple lower-cost, lower impact providers. This is common sense -- like having a fiduciary investment advisor rather than one providing their own product.

Sincerely

Thomas Cowen & Meredith Stricker  
Carmel, CA

## Response to Letter 63b, Meredith Stricker & Thomas Cowen

1. This comment expresses a preference for an alternative to the project, and concerns an alleged restriction on stadium lights in the original Deeds to the District for Carmel High School. This comment does not raise an environmental issue regarding the project and, therefore, no response is necessary. Nevertheless, as a courtesy, the District notes that the Deeds are available on the District's California Public Records Act webpage (<https://www.carmelunified.org/Page/6026>) under "Responsive Documents" for request "2122\_03 Dillard." (See also: <https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/Dillard%20Response%20Redacted%2009.15.21.pdf>). No such restriction is contained in the Deeds.
2. This comment concerns an alleged conflict of interest with Musco Sports Lighting, LLC, ("Musco") providing both design and products for the proposed project. does not raise an environmental issue regarding the project and, therefore, no response is necessary. However, the District clarifies that there is no such conflict, and this comment misstates Musco's role. The District's engineering contractor (KNA Structural Engineers) is responsible for the structural drawings of the footings and poles, not Musco. The engineering contractor specified the materials and products for the proposed project, including the lighting, based on its professional assessment and the District's needs. Furthermore, for disclosure purposes, the school district utilizes Musco for the following reasons:
  - a. The current pool lights are Musco which simplifies replacement with Musco LED lights;
  - b. The district has used Musco's control system since the installation of the lights in 2007 and is familiar with the programming and operation; and
  - c. Musco is the leading company in sports lighting technology and is familiar with the requirements for the California Department of the State Architect (DSA) approval of their poles and lighting systems.

No changes to the RDEIR are necessary.



On Sat, Oct 1, 2022 at 1:43 AM Will Chow <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> wrote:

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet RDEIR still allows up to 400 practices and 124 games at night and also fails to perform a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

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5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm (see pic here) and Outlook Dr at

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6:21pm (see pic here).

a. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

b. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqqykOWRp60fDM\\_IrZgQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqykOWRp60fDM_IrZgQMfTarGEWSS2/view?usp=sharing)

c. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pIL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 124 games each year that will use the lights. This is practically every day of the school year, so additional mitigations are not just needed but absolutely critical to preserving the scenic vistas and visual character of Carmel:

a. Disallow lights usage on weekends for any use, period.

b. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR does propose a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say, and overrule if necessary, for any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

a. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

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A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR is incorrect and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

a. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

b. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. RDEIR dismisses noise as a significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This has been seen already during current Saturday afternoon football games (see pic here). As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

a. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

D. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate local regulations. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them even if it has the authority to do so.

A. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

B. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this this Monterey County regulation?

a. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

b. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing>

C. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to meet all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be corrected to show that its impacts on both traffic and light will be significant lower than at CHS.

a. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (more cars than on Carmel Valley Road) and residential neighborhood (more homes than around CMS).

b. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >420-ft. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce all of the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Will Chow

[getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org)

25040 Pine Hills

Carmel, California 93923



## Response to Letter 64, Will Chow

1. See response to Letter 2b.

On Sat, Oct 1, 2022 at 9:29 PM Fevzi Karavelioglu <[karavelioglu@gmail.com](mailto:karavelioglu@gmail.com)> wrote:

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Hello, aside from short term issues that will arise due to construction at the school with traffic and pollution, and in the long term the extra traffic on event days (with increased parking capacity and hosting more events), I have a few questions. First, it feels like too much emphasis is given to football. Tennis and other sports are not as important. What kind of impact do you expect in terms of participation in tennis after the tennis court at the high school is demolished and the only option is to use the one at the middle school? And I am not clear about the capacity of the tennis court at the middle school, would it be able to meet the demand if tennis becomes more popular? Seems like it would put up a barrier and naturally limit participation. Frankly, with all the bad publicity regarding injuries the athletes who play American football are subjected to, I am not sure it is the best way to invest our funds. I'd rather spend our funds on improving our facilities for sports both girls and boys can participate in.

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Secondly, regarding the events that would be hosted at the stadium after the proposed changes have been made. What are the rules around the events, kind of events, what days and times of the week can events be scheduled and who would be in charge of it? Can those rules and control of these events be changed without having the public review the changes and allowed to provide feedback?

3

Lastly, what kind of a message would the removal of the tennis court send to our kids? Are there any plans to increase participation in sports other than football? Do you think most students have sufficient options for the kinds of sports they may be interested in?

Sincerely,  
Fevzi Karavelioglu  
24520 Outlook Dr. Apt 25  
Carmel, CA 93923

## Response to Letter 65, Fevzi Karavelioglu

1. The commenter raises their concern regarding emphasizing football over other sports at the high school. However, no environmental issues are raised and therefore, no response is necessary.
2. The commenter questions the type and frequency of events at the stadium after implementation of the project. Table 4-3, Proposed Stadium and Pool Facility Lighting Schedule, in the RDEIR presents the anticipated number of days in each of 10 months (August to May) that the stadium lights would be used. Start time and end times are also presented. The table shows that the proposed stadium lights would be used approximately 147 days (including both practices and games) and that the length of time the lights would be on would range from about ½ hour to three hours, with a maximum of 3.5 to 5.5 hours for three games per year.

The commenter also questions the rules around the events, kind of events, what days and times of the week can events be scheduled and who would be in charge of it. The school district will oversee and enforce all rules associated with events at the stadium. In addition, Mitigation Measure 5-2b requires the district to prepare and adopt a policy that restricts use of the 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. Please note that the school district's definition of "non-school" groups, is any group or entity other than Carmel Unified School District, its schools, and programs. This has been clarified in the mitigation measure. See Section 3.0, Changes to the RDEIR, in this Final EIR.

3. Comment noted. The proposed project is not intended to increase or decrease participation in any sports available at Carmel High School. This comment does not raise an environmental issue and therefore, no further response is necessary.

Dear Dan Paul and CUSD Board Members,

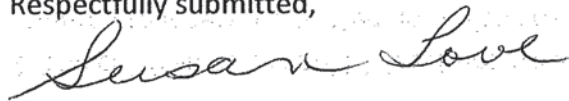
October 1, 2022

As a past educator and employee of CUSD, students have always been my priority. However, I applaud the numerous informed and dedicated individuals who have studied and exposed the many detrimental, negative impacts of installing stadium lights. The environment, nature, community, and the character of our quaint and charming surroundings would forever be marred.

In addition to these negative impacts, I would like to address three thoughts/concerns of my own.

1. I run past the CHS tennis courts daily, wondering why you would eliminate one sport in favor of another and destroy the tennis courts for a football parking lot. Every time I run by, I see the sign "Thank You" attached to the fence. I wonder what you will tell those generous donors and supporters who ensured that the courts would be built on behalf of the students and the community. Will you say, "We got rid of them to promote team spirit?"
  
2. The children at Carmel High School are among the most fortunate in this country. They have talented teachers, dedicated administrators, concerned parents, and a community that cares. They have a magnificent field on which to play football with a stunning scenic backdrop. I have always believed that the afternoon games give the students a wholesome and fun activity in which to participate or to attend on Saturday afternoons. Perhaps it's important for them to learn that they can't have everything they want. They need to ask themselves, "are our wants for night games more important than the many negative ramifications of installing the lights?" In summary, would night games really have that great of a positive impact on the students at Carmel High and their "team spirit" to merit 80-foot stadium lights?
  
3. In today's Monterey Herald (Oct. 1<sup>st</sup>), there is an editorial: **We need to do a better job of conserving energy.** I am quoting one sentence from that editorial that should be given utmost consideration before installing stadium lights. "A greater focus on how to use less energy must become a permanent priority." CUSD must do its share whenever possible.

Respectfully submitted,



Susan Love  
25199 Flanders Drive  
[susanlcarmel@gmail.com](mailto:susanlcarmel@gmail.com)

## Response to Letter 66a, Susan Love

1. The commenter expresses their opposition to the removal of the tennis courts. For clarity, the proposed project does not include eliminating tennis from as a sport available to students at Carmel High School. No environmental issue is raised and therefore, no further response is required. A decision on the proposed project's merits will be made by the Board, who will consider all comments.
2. The commenter questions the need for stadium lights and raises social issues that are outside the scope of the RDEIR and CEQA. However, no environmental issue is raised and therefore, no response is required.
3. The commenter quotes a local newspaper article citing the need to conserve more energy. Energy impacts associated with the proposed project are addressed in Section 8.0, Energy, of the RDEIR, and in Section 3.0, Changes to the Revised Draft EIR, of this final EIR.

From: **Susan Love** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Mon, Oct 10, 2022 at 10:17 AM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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In light of all of the negative impacts that the stadium lights would have on our community, the environment, nature, safety, and tennis, I find it unconscionable that the CUSD board members and Superintendent Ted Knight would continue to promote their installation.

I join the many others who have studied, discussed, and are greatly concerned about the "many aspects of the RDEIR, which are summarized here and discussed in more detail below:"

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1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.



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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

-----

#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr on 12/7/2021 at 5:48pm:

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

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B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
  - ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
  - iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.
- a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Susan Love

[susanlcarmel@gmail.com](mailto:susanlcarmel@gmail.com)

25199 Flanders Drive

Carmel, California 93923



## Response to Letter 66b, Susan Love

1. The commenter expresses their opposition to the proposed project and notes the negative impacts to the “environment, nature, safety, and tennis.” However, the commenter does not provide a specific comment on the environmental analysis and therefore, no further response is necessary.
2. See response to Letter 2b.

**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding your Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!

## Response to Letter 66c, Susan Love

1. See response to Letter 2c and Letter 33.

Hello CUSD Board and Superintendent Knight,

1 | We live on Atherton down towards Rio Road. When you have football games at CHS we can hear the crowd yelling and the PA system. Sounds carries well in this neighborhood.

2 | We're concerned that there is no real limit on how many games you can have at night. It's just a policy and policies can change. It appears the community has no control over whether you decide to rent out the stadium for other noisy events at night.

3 | The beauty of the night sky in Carmel is a treasure. It would be very sad to see the light pollution from these glaring stadium lights. They seem oversized and out of place.

How are huge stadium lights a necessity for the majority of your students? It seems like you are serving a minority interest here.

4 | Show us the full impact of the light pollution on our treasured views and night skies.  
• Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?

5 | Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.  
• Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve to all of the CEQA requirements.

6 | Provide full and consistent disclosure on how many practices and games the lights will be on for.  
• Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)  
• BUT the truth is on page 103 with up to 400 practices and 124 games across multiple sports.  
• Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

7 | Please re-start community engagement with a legally required Scoping Session.

Your Hatton Fields neighbors,

Melodie Chrislock and Phil Wellman

## Response to Letter 67, Melodie Chrislock & Phil Wellman

1. The commenters express their concern about existing noise heard from events held at Carmel High School Stadium. No comment on the RDEIR is provided and therefore, no response is necessary.
2. The commenter expresses their concern over limitations on use of the stadium provided in the RDEIR. As discussed in Section 5.0, Aesthetics, of the RDEIR, mitigation measure 5-2b requires the school board to adopt a policy that restricts use of the stadium and pool facility by non-school related groups after dark.
3. The commenter expresses their concern over light pollution. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR.
4. See response to comment 1 from Letter 2c.
5. See response to comment 2 from Letter 2c.
6. See response to comment 9 from Letter 2c.
7. See response to comment 3 from Letter 2c, comment 1 from Letter 14-4-a, comment 2 from Letter 14-2-c, comment 4 from Letter 2b, and comment 16 from Letter 11b.

No changes to the RDEIR are required.

On Sun, Oct 2, 2022 at 10:17 PM Karyl Hall <[hallnelson@comcast.net](mailto:hallnelson@comcast.net)> wrote:

1 | I am a long time Carmel resident who stands against stadium lights at CHS.  
| Dr. Karyl Hall, Dolores Street, 2 NE Second Ave.



## Response to Letter 68a, Dr. Karyl Hall

1. The commenter expresses their opposition to the proposed project but does comment on the RDEIR. A decision on the project's merits will be made by the Board, who will consider all comments. Therefore, no response is necessary.

From: **Karyl Hall** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 9:09 AM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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con't.

4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

-----

#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_lrzqQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_lrzqQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded



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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Karyl Hall

[hallnelson@comcast.net](mailto:hallnelson@comcast.net)

Carmel, California 93921

## Response to Letter 68b, Dr. Karyl Hall

1. See response to Letter 2b.

On Sun, Oct 2, 2022 at 11:04 AM Patricia Kirshner <[patriciakirshner@gmail.com](mailto:patriciakirshner@gmail.com)> wrote:

To Whom It May Concern:

1 We are 30+ year residents in the neighborhood behind Carmel High School. Our children attended Carmel schools beginning at River School through graduation at Carmel High. Their experience in the Carmel schools, which included many football games, was wonderful for many reasons. Their teachers and level of education were outstanding, extracurricular activities were character building, and the impact of the viewshed of each campus cannot be measured on their psyche.

It is the natural environment I would like to speak to in this letter. In our current world, the natural landscape is being compromised with each passing year. We are all aware of the impact Global Warming is having on every aspect of life, especially that of the animal kingdom that has NO say or ability to mitigate or change the trajectory global warming will have on their habitat and lifespan.

With all the talk about the athletes and their "need" to play games at night, I wonder where the conversation regarding our - both students and adults - impact has on the beautiful and fragile natural environment we are so lucky to live in? The school environment is not just about sports, but also about nurturing the "whole" person - educating our young people to grow into mature adults who will be responsible for caring for and preserving all aspects of places like Carmel.

While we talk of night games, let's not forget that while we light the night like it was day, and scream and honk and holler and drive and park and litter, we are impacting thousands of animals who have evolved to exist in the dark and quiet night. Where is their voice? How are we educating our young people if we do not even address this topic with them at the same time we support their other interests.

Yes, I certainly have a selfish interest in how my neighborhood feels at night. We bought our house because of the beauty here which has always included darkness and quiet at night. However, we must now speak for the creatures on this earth who, more and more, are being compromised out of existence, because we humans want what we want and damn the voiceless ones.

As Carmel Unified School District pushes this new "necessary" need of night lights, I beseech that same school district to balance this "need" with a conversation with the student body about being responsible stewards of the awesome gift they (we), who are lucky to attend Carmel schools, have to preserve what makes living here so exquisite.

Sincerely,  
Patricia and James Kirshner

## Response to Letter 69, Patricia & James Kirshner

1. The commenters address their concerns regarding project impacts associated with light and noise especially to animals. Lighting and noise impacts to biological resources, including special-status wildlife species, are addressed in Section 7.0, Biological Resources, of the RDEIR. Light impacts are addressed in Section 5.0, Aesthetics, and noise impacts are addressed in Section 10.0, Noise, of the RDEIR. No changes to the RDEIR are required.

On Sun, Oct 2, 2022 at 4:00 PM Michael Lipscomb <[amhpkng@gmail.com](mailto:amhpkng@gmail.com)> wrote:

1 | The lights will cause tons of carbon hitting the cars on hwy 1 as it bounces around. Will it block hwy 1? This maybe  
could to stop tourists and help the environment depending where it bounces. I will form a police group to study. Big Joe

Sent from my iPhone



## Response to Letter 70, Michael Lipscomb

1. The commenter states that the lights will cause tons of carbon to hit cars on State Route 1 and block traffic. Carbon dioxide produced as a by-product of burning fossil fuels to produce electricity is a colorless and odorless gas. It is produced at the location where electricity is generated, not where the electricity is consumed. In its gaseous form, it has no properties of a solid that could result in it hitting cars or blocking State Route 1.

From: **Jody Lyons** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Mon, Oct 3, 2022 at 11:53 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

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2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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con't.

4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

-----

#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded



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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.
  - a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Jody Lyons

[jlyonsbrooklyn@gmail.com](mailto:jlyonsbrooklyn@gmail.com)

25815 Hatton Road

Carmel, California 93923

## Response to Letter 71, Jody Lyons

1. See response to Letter 2b.

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From: **RJC JRC** <[notochslights@gmail.com](mailto:notochslights@gmail.com)>  
Date: Mon, Oct 3, 2022 at 10:17 AM  
Subject: Serious Health Concern Question WE WANT ANSWERS TO regarding air quality  
Re Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

October 2, 2022

Dear Carmel School Board and TED KNIGHT:

1 Exactly - What is the air Quality testing at the football field AND parking lot locations that has been SIMULATED with the increased vehicle traffic and during the COLD winter nights that has been conducted??? -- We deserve and we want to know precisely!????

Have you CONDUCTED/DONE specific AIR QUALITY testing at and around the football field DURING nighttime and DURING the cold winter months at 7-9:00 pm at night? What are the results? We want to see the testing? How was proper AIR quality testing done with hundreds more vehicles simulated at rush hour on a Friday night?

2 Most homes AND businesses in downtown CARMEL and all of the surrounding neighborhood use WOOD burning fireplaces for heat and ambiance - surely you are aware of the dangers of YOUTH breathing in WOOD smoke and SMOG VEHICLE EMISSIONS -

“ During the wintertime, residential wood smoke is a main contributor to fine particle pollution (PM) and is responsible for poor air quality days in many areas across the United States. The following articles and videos highlight the health effects related to PM exposure from residential wood smoke.

## **Who is at risk from wood smoke?**

Wood smoke can affect everyone, but the populations known to be at greater risk include: children, teenagers, older adults, people with lung disease -- including asthma and COPD, people with heart disease, outdoor workers, and people of low

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con't.

socioeconomic status, including those who are homeless and with limited access to medical care. Research indicates that obesity or diabetes may also increase risk. New or expectant mothers may also want to take precautions to protect the health of their babies, because some studies indicate they may be at increased risk.“

read link:

<https://www.epa.gov/burnwise/wood-smoke-and-your-health>

Read link: [https://www.epa.gov/sites/default/files/2018-01/documents/ace3\\_criteria\\_air\\_pollutants\\_updated\\_1-19-18\\_508\\_0.pdf](https://www.epa.gov/sites/default/files/2018-01/documents/ace3_criteria_air_pollutants_updated_1-19-18_508_0.pdf)

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SO WE CLEARLY ASK YOU - what is the difference between NON rush hour daytime and air quality at nighttime exactly simulated on a Friday night DURING RUSH HOUR traffic jams at 7:00,8:00 and 9:30 at NIGHT in the COLD winter months? The simulations of course need to add the hundreds or thousand vehicles you anticipate increased attendance to the games - and will create increasing SMOG and stopped traffic vehicles Idling on the 1 while trying to find parking and entering the parking lots?

Also what is the air quality change that WILL occur in the surrounding neighborhoods As Well?

4

As educators I am sure you must know that our children's Lungs are Not fully developed and breathing in emissions and wood smoke at any levels while heavy breathing and exercising is NOT recommended by health professionals so I ask you all again why would this even be a consideration to be exercising directly off a major highway with stooped rush hour traffic and more congestion you are creating more Vehicle emissions more smog and potential to cause our children cancers asthmas and other health complications - tell us the difference in air quality between saturday and daytime use verses Friday night winters time use at the school field - we deserve to know the scientific answer ???

<https://www.epa.gov/burnwise/wood-smoke-and-your-health>

Sincerely,

RHC/Concerned Future Parent of Carmel Highschool Attendee and RESIDENT

## Response to Letter 72a, RJC JRC

1. This comment is regarding the proposed project's air quality impacts. Air quality is addressed in Section 6.0, Air Quality, of the RDEIR. Operational criteria pollutant emissions for mobile sources were estimated using the California Emissions Estimator Model (CalEEMod) version 2020.4 software, a modeling platform recommended by the California Air Resources Board (CARB) and accepted by the Monterey Bay Air Resources District. The CalEEMod platform allows calculations of operational area and mobile-source criteria pollutant and greenhouse gas (GHG) emissions from land use projects. No changes to the RDEIR are required.
2. This comment is about air pollution associated with wood burning fireplaces. The proposed project does not include wood burning fireplaces, or wood burning of any kind, as such wood burning is not the subject of the RDEIR. Therefore, no response is necessary.
3. This comment is regarding the proposed project's air quality impacts. See response to comment 1 above.
4. This comment is about wood smoke and air quality from vehicle emissions. See responses to comments 1 and 2 above.



From: **RJC JRC**  
<[notochslights@gmail.com](mailto:notochslights@gmail.com)> Date: Mon,  
Oct 3, 2022 at 10:23 AM Subject:  
Monarchs - reply requested  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

October 2, 2022

Dear Carmel Unified School Board & TED Knight!:

1 | Please use your education answer to us scientifically HOW will you mitigate your proposed LIGHTS TO PROTECT OUR PRECIOUS ENDANGERED SPECIES THE MONARCH Butterfly? WHO travel to this area specifically during migration? We want an answer? NO TO Lights! PROTECT OUR ONE AND ONLY EARTH!

Please read this informative article and LET US KNOW HOW you plan to protect OUR butterflies?

<https://www.uc.edu/news/articles/2022/05/lights-can-interfere-with-monarch-butterfly-navigation-abilities.html#:~:text=But%20monarchs%20exposed%20to%20nighttime,jet%20lag,%E2%80%9D%20Guerra%20said>

Sincerely ,  
Extremely Concerned CARMEL Resident  
and conservationist

## Response to Letter 72b, RJC JRC

1. This comment is noted and the link to *Light pollution Can Disorient Monarch Butterflies* (University of Cincinnati 2022) was reviewed by EMC Planning Group principal biologist, Janet Walther, MS.

In December 2020, the U.S. Fish and Wildlife Service (USFWS) determined that listing the monarch under the Endangered Species Act is warranted but was precluded at the time by higher priority listing actions. With this finding, the monarch butterfly becomes a candidate for listing; USFWS will review its status each year until they are able to begin developing a proposal to list the monarch. The monarch butterfly is not currently protected under the state or federal Endangered Species Acts; however, candidates for federal listing are considered under CEQA.

Known occurrences of monarch butterfly overwintering habitat are recorded in the California Department of Fish and Wildlife (CDFW)'s California Natural Diversity Database (CNDDDB). There are no recorded observations of monarch butterfly overwintering habitat at the Carmel High School campus. The nearest record is approximately one-half mile southwest of the campus, at the Lester Rowntree Arboretum, where small numbers (less than 100) were last recorded in in the CNDDDB in 1984. There are numerous existing light sources between the campus and arboretum, including residential lighting, street lighting, and lighting along State Route 1. While it is acknowledged that lighting could impact monarch migratory activity, overwintering habitat is not known to occur at the campus. Impacts as result of the project are anticipated to be less than significant and no changes to the RDEIR are recommended.

It should also be noted that the CDFW provided a comment letter on this RDEIR. No concerns regarding potential impacts to monarch butterfly were identified in the comments.

No changes to the RDEIR are required.

From: **RJC JRC** <[notochslights@gmail.com](mailto:notochslights@gmail.com)>

Date: Mon, Oct 3, 2022 at 11:06 AM

Subject: Revised draft EIR stadium lights project - Safety regarding stadium lights project! Reply REQUESTED!

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[mheditor@montereyherald.com](mailto:mheditor@montereyherald.com)>, <[paul@carmelpinecone.com](mailto:paul@carmelpinecone.com)>

Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[district5@co.monterey.ca.us](mailto:district5@co.monterey.ca.us)>, <[jlyons@carmelunified.org](mailto:jlyons@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>

October 2, 2022 - reply requested -

To: Carmel High School/School board/Ted Knight!

1 We want to know an answer to this - What exactly is YOUR safety, evacuation & police & security presence if there happens to be a mass shooting or something like this common in schools nowadays? 🤖 or a bomb threat or some other terror event - and in most especially dangerous and congested highway at night? I saw it on the news about an increase in mass shootings at high school sports events -

there was a shooting a a high-school football game on the news can't even imagine if that happened in the dark on such a congested gridlocked roadway no way for police in and ambulances out quickly in grid locked rush hour? Highschool kids brought guns to the game!!!!

- How will YOU protect the ENTIRE neighborhood and disabled NURSING HOME RESIDENTS who reside at the 2 Nursing homes on Morse and Flanders Drive if a shooting or terrorism or bombing were to occur??

What is the emergency evacuation plan for the safety of ALL the residents???? -how will that happen speedily??? What is your plan???

- and with huge crowds and thousands of kids coming from all over the place who knows what could happen out there it is scary nowadays.

It just happened up in Oakland 6 shot at a school - you WILL BE held accountable if anything like this happens!

What is the exact thought-out and thoroughly preventative and preparedness plan and police and evacuation plan for the school and the entire surrounding neighborhood too?

News link/article football game shooting: <https://www.usnews.com/news/us/articles/2022-10-01/man-shot-several-times-at-california-youth-football-game>

Please let us know!?! -Thanks.

Extremely Concerned Resident & Future Parent of Carmel High school attendee!

## Response to Letter 72c, RJC JRC

1. Comment noted. This comment is about mass shootings and bomb threats. Such issues, including stated past incidents of school shootings in Oakland, are outside the scope of the RDEIR and the CEQA process. No environmental issues are raised and therefore, no response is necessary.

----- Forwarded message -----

From: **RJC JRC** <[notochslights@gmail.com](mailto:notochslights@gmail.com)>

Date: Mon, Oct 3, 2022 at 11:11 AM

Subject: Revised draft EIR stadium lights project - Safety regarding stadium lights project! Reply REQUESTED!

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[mheditor@montereyherald.com](mailto:mheditor@montereyherald.com)>, <[paul@carmelpinecone.com](mailto:paul@carmelpinecone.com)>, <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>

October 2, 2022 - reply requested -

1 Here is another news article!

This is happening all over the USA right now!

How will these shootings be proactively prevented?

<https://www.nbcnews.com/news/amp/rcna50362>

To: Carmel High School/School board/Ted Knight!

We want to know an answer to this -

What exactly is YOUR safety, evacuation & police & security presence if there happens to be a mass shooting or something like this common in schools nowadays? 🤖 or a bomb threat or some other terror event - and in most especially dangerous and congested highway at night?

I saw it on the news about an increase in mass shootings at high school sports events -

there was a shooting a high-school football game on the news can't even imagine if that happened in the dark on such a congested gridlocked roadway no way for police in and ambulances out quickly in grid locked rush hour? Highschool kids brought guns to the game!!!!

- How will YOU protect the ENTIRE neighborhood and disabled NURSING HOME RESIDENTS who reside at the 2 Nursing homes on Morse and Flanders Drive if a shooting or terrorism or bombing were to occur??

What is the emergency evacuation plan for the safety of ALL the residents???? -how will that happen speedily??? What is your plan???

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- and with huge crowds and thousands of kids coming from all over the place who knows what could happen out there it is scary nowadays.

It just happened up in Oakland 6 shot at a school - you WILL BE held accountable if anything like this happens!

What is the exact thought-out and thoroughly preventative and preparedness plan and police and evacuation plan for the school and the entire surrounding neighborhood too?

News link/article football game shooting: <https://www.usnews.com/news/us/articles/2022-10-01/man-shot-several-times-at-california-youth-football-game>

Please let us know!? -Thanks.

Extremely Concerned Resident & Future Parent of Carmel High school attendee!



## Response to Letter 72d, RJC JRC

1. The comment is repetitive of general comments previously stated by the commenter. See response to letter 72c above.

----- Forwarded message -----

From: **RJC JRC** <[notochslights@gmail.com](mailto:notochslights@gmail.com)>

Date: Mon, Oct 3, 2022 at 11:18 AM

Subject: Revised draft EIR stadium lights project - Safety regarding stadium lights project! Reply REQUESTED!

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[mheditor@montereyherald.com](mailto:mheditor@montereyherald.com)>, <[paul@carmelpinecone.com](mailto:paul@carmelpinecone.com)>, <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[dpotter@ci.carmel.ca.us](mailto:dpotter@ci.carmel.ca.us)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[district5@co.monterey.ca.us](mailto:district5@co.monterey.ca.us)>

October 2, 2022 - reply requested -

1 Here is another news article!

This is happening all over the USA right now!  
How will these shootings be proactively prevented?

<https://www.nbcnews.com/news/amp/rcna50362>

Another news article: <https://amp.tzm.com/2022/09/15/high-school-football-coach-joe-pastrana-shot-vallejo-high-school-california-police/>

To: Carmel High School/School board/Ted Knight!

We want to know an answer to this very real safety issue?

What exactly is YOUR safety, evacuation & police & security presence if there happens to be a mass shooting or something like this common in schools nowadays? 🤖 or a bomb threat or some other terror event - and in most especially dangerous and congested highway at night?

I saw it on the news about an increase in mass shootings at high school sports events -

there was a shooting a high-school football game on the news can't even imagine if that happened in the dark on such a congested gridlocked roadway no way for police in and ambulances out quickly in grid locked rush hour? Highschool kids brought guns to the game!!!!

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- How will YOU protect the ENTIRE neighborhood and disabled NURSING HOME RESIDENTS who reside at the 2 Nursing homes on Morse and Flanders Drive if a shooting or terrorism or bombing were to occur??

What is the emergency evacuation plan for the safety of ALL the residents???? -how will that happen speedily??? What is your plan???

- and with huge crowds and thousands of kids coming from all over the place who knows what could happen out there it is scary nowadays.

We are TAX PAYERS AND RESIDENTS AND WE ARE STRONGLY OPPOSED TO ANY LIGHTS OR MORE TRAFFIC AND NUMEROUS SAFETY HAZARDS THIS PROPOSED PROJECT WILL CREATE!

It just happened up in Oakland 6 shot at a school - be sure you WILL BE held accountable if anything like this happens!

What is the exact thought-out and thoroughly preventative and preparedness plan and police and evacuation plan for the school and the entire surrounding neighborhood too?

News link/article football game shooting: <https://www.usnews.com/news/us/articles/2022-10-01/man-shot-several-times-at-california-youth-football-game>

Please let us know!? -Thanks.

Extremely Concerned Resident & Future Parent of Carmel High school attendee!

## Response to Letter 72e, RJC JRC

1. The comment is repetitive of general comments previously stated by the commenter. See response to letter 72c above.

From: **RJC JRC** <[notochslights@gmail.com](mailto:notochslights@gmail.com)>  
Date: Mon, Oct 3, 2022 at 11:52 AM  
Subject: Revised draft EIR - reply requested regarding mountain lion PRESERVE habitat in Hatton canyon  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[paul@carmelpinecone.com](mailto:paul@carmelpinecone.com)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[dpotter@ci.carmel.ca.us](mailto:dpotter@ci.carmel.ca.us)>, <[district5@co.monterey.ca.us](mailto:district5@co.monterey.ca.us)>, <[mheditor@montereyherald.com](mailto:mheditor@montereyherald.com)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[jlyons@carmelunified.org](mailto:jlyons@carmelunified.org)>

October 2, 2022

To: Carmel high school board of education/Ted Knight!

1 Please Take A MOMENT and REALLY PONDER WHAT ANY additional LIGHT POLLUTION WOULD DO TO OUR PRECIOUS NATURAL RESOURCE AND THE MOUNTAIN LION WHO LIVES IN THE HATTON CANYON DIRECTLY ADJACENT TO THE CARMEL HIGHSCHOOL! —IN OUR BACKYARDS LITERALLY!

The CA STATE PARKS just purchased this last year these PRECIOUS acres of land in Hatton Canyon and Pt. lobos for Mountain Lion preservation!

Mountain Lions, coyotes and bobcats hunt at DUSK and any lights or noise or traffic would adversely affect their natural rhythm and natural hunting habitat!

We live in this CARMEL forested area and we have seen mountain lions and bobcats and coyotes in our backyards regularly! We oppose any light pollution and we are fairly certain after dole gent research the mountain lions who have NO VOICE oppose the lights as well! It goes without saying traffic smog noise and light pollution ALL negatively affect our natural ecosystem - how will you protect them and US? we moved here for the city to be living nearby nature near trees near our protected forests! Are you being a mentor and modeling protective practices to our youth and educating them on the dangers of climate change and preserving wildlife habitat to those who have no voice who's habitats are endangered? I hope so.

This is simply NOT only about sports or teams, lights if you say you want to put OUR children FIRST then first and foremost our Mother Earth NEEDS our protection as do all species living on the one and only earth WE ALL SHARE and must protect together for THEIR future - for our children's FUTURES - for all of us to benefit from for generations to come! We MUST look at the big picture which needs utmost consideration and Protection!

One just needs to turn in the news and you can see all the massive floods, fires, tornadoes, ocean sea levels rising, the earth is already in turmoil and needs us to preserve and protect it in its most natural state!

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con't.

Their ONLY-natural habitat is dwindling FAST due to fires and climate change - and already threatened and they hunt primarily at DUSK!

Read Article:

<https://ucscampusreserve.ucsc.edu/media1/mountain-lion>

We do NOT want to see any lights or have their habitat affected - we DO NOT want any more traffic - any more smog or any light pollution in OUR protected areas - HOW WILL YOU MITIGATE your proposed Lights to ZERO IMPACT -and ALL the negative environmental impacts they will have on all of us residents as well as these protected precious lands that have been dedicated to protecting the mountain lions in California ?

READ Website link:

<https://mountainlion.org/2021/05/25/carmel-area-state-parks-adds-over-1600-acres-for-mountain-lions/>

Sincerely,

RJC/JRC/Very concerned resident of Carmel as well as future parent of Camel high school attendee!



## Response to Letter 72f, RJC JRC

1. The commentor questions whether stadium lighting would impact the activities of larger native mammals, such as coyote, bobcats, and mountain lion. Please refer to Section 7.0, Biological Resources, of the RDEIR. Coyotes and bobcats are not listed by the state or federal Endangered Species Acts, however mountain lions are legally classified as "specially protected species." In April 2020, the California Fish and Game Commission found that listing of an evolutionarily significant unit (ESU) located in Southern California and along the central coast of California may be warranted and designated mountain lion within the ESU as a candidate species under the California Endangered Species Act. The California Department of Fish and Wildlife (CDFW) is now completing a status review of mountain lions within the proposed ESU. Upon completion, CDFW will make its recommendation on listing to the Commission. Under the California Endangered Species Act, species classified as a candidate species are afforded the same protection as listed species and should be considered during the preparation of CEQA documents, if warranted.

The proposed project is located within the general range for mountain lion, which includes most of the mountainous areas of California, according to the CDFW Biogeographic Information and Observation System (<https://apps.wildlife.ca.gov/bios/?al=ds85>). According to Figure ES-1 of A Petition to List the Southern California/Central Coast Evolutionarily Significant Unit of Mountain Lions as Threatened under the California Endangered Species Act, page 3, (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=171208&inline>), the proposed project is located within population CC-C, which extends from Moss Landing to Ventura. The Carmel High School campus is a developed area designated in the Terrestrial Connectivity, Areas of Conservation Emphasis database as an area with limited connectivity opportunities. The closest migratory corridors or areas of conservation emphasis as designated by the CDFW are located approximately three quarters of a mile east of the project and Hatton Canyon is not included within the corridor (<https://apps.wildlife.ca.gov/bios6/?bookmark=648>).

Areas of high human activity have lower occupancy of rare carnivores. Mountain lions tend to avoid roads and trails by the mere presence of those features, regardless of how much they are used ([https://www.researchgate.net/publication/341131494\\_Recreation\\_Effects\\_on\\_Wildlife\\_A\\_Review\\_of\\_Potential\\_Quantitative\\_Thresholds](https://www.researchgate.net/publication/341131494_Recreation_Effects_on_Wildlife_A_Review_of_Potential_Quantitative_Thresholds)). Mountain lions show some flexibility in navigating urbanized landscapes; they spent more than 95 percent of their time away from developed areas and actively avoided open areas like golf courses, cemeteries, and other altered landscaped spaces (<https://wildlife.onlinelibrary.wiley.com/doi/abs/10.1002/jwmg.22127>). The campus is located within a developed area with numerous existing light

sources in the vicinity, including residential lighting, street lighting, and (auto) lighting along State Route 1. If mountain lions are currently moving through Hatton Canyon and/or the urbanized area, they are currently exposed to urban stressors, such as roads and cars, lighting, noise, domestic pets, etc. Stadium lights would be on for short periods consisting of two to four hours a night for up to four months, with most of the light use occurring during the school year between October and May. While the proposed project would result in an increase of lighting in the area, when the lights are on, this is consistent with existing urban activities. Therefore, the proposed project would not have an adverse effect, either directly or through habitat modifications, on the mountain lion.

It should also be noted that the CDFW provided a comment letter on this RDEIR. No impacts to mountain lion were identified in the comments.

No changes to the RDEIR are required.

----- Forwarded message -----

From: **RJC JRC** <[notochslights@gmail.com](mailto:notochslights@gmail.com)>

Date: Fri, Oct 7, 2022 at 6:20 PM

Subject: Reply REQUESTED - we would like answers to ALL of these points regarding Revised DRAFT EIR stadium lights project

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>, <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[paul@carmelpinecone.com](mailto:paul@carmelpinecone.com)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, <[dpotter@ci.carmel.ca.us](mailto:dpotter@ci.carmel.ca.us)>

Cc: <[district5@co.monterey.ca.us](mailto:district5@co.monterey.ca.us)>, <[mheditor@montereyherald.com](mailto:mheditor@montereyherald.com)>, <[jlyons@carmelunified.org](mailto:jlyons@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>

Dear Carmel Unified High School/Ted Knight:

1 | Please see attached 3 pages we would like detailed answers to all of these questions. Thank you!

Sincerely,

Concerned Resident AND future Patent of Carmel High School 

**TO:** Superintendent Ted Knight  
**VIA:** [feedback@carmelunified.org](mailto:feedback@carmelunified.org)

Carmel Unified School District,  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

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cont. We have serious concerns regarding **your** Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - Updating required school area warning signage
  - Consider posted speed reductions down to 15 MPH in school areas
  - Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps
  - Exploring additional stop sign controls at intersection
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.



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- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

- |                  |                                |
|------------------|--------------------------------|
| Sara Hinds       | shinds@carmelunified.org       |
| Karl Pallastrini | kpallastrini@carmelunified.org |
| Tess Arthur      | tarthur@carmelunified.org      |
| Anne Marie Rosen | arosen@carmelunified.org       |
| Seaberry Nachbar | snachbar@carmelunified.org     |

NAME: CARMEL RESIDENTS + concerned citizen Rich  
 DATE: October 4, 2022  
 CONTACT INFORMATION: Sayno to lights@gmail.com



## Response to Letter 72g, RJC JRC

1. See response to Letter 2c and Letter 33.

From: **RJC JRC** <[notochslights@gmail.com](mailto:notochslights@gmail.com)>

Date: Fri, Oct 7, 2022 at 8:20 PM

Subject: Traffic and Grounds Supervision

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[dpotter@ci.carmel.ca.us](mailto:dpotter@ci.carmel.ca.us)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

**To CUSD board members and Superintendent Ted Knight:**

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1 The RDEIR indicates that the residential side roads can not be utilized for parking and that signs will be placed indicating it is a no parking zone. This will not be sufficient to prevent cars from going around these barriers and parking in the residential areas surrounding the school. The roads need parking attendants present to ensure cars do not park in the residential areas and that the side streets are for residential use only. Without attendants the issue of parking on the residential streets has not been mitigated.

The RDEIR does not address or mitigate the issue of cars driving around from the Morse parking exit through the subdivision on Flanders Drive to get the Red light on Highway 1. The traffic and speeding is significant from the high school traffic and this would create a very dangerous situation if the residential streets are not blocked to residence/guest traffic only.

There is no mention in the RDEIR about supervision on the lower parking lot near the baseball fields and supervision of the baseball fields. These areas need to be supervised and the baseball field not used for congregation of students visitors which would cause significant safety concerns

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. *As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.*

Sincerely,

RJC/JRC -- Very concerned resident of Carmel as well as future parent of Camel high school attendee!

## Response to Letter 72h, RJC JRC

1. This comment is about parking in the neighborhoods, parking attendants, and supervision on the baseball field. Parking in the neighborhoods is addressed in the RDEIR in the following sections: Section 3.0, Environmental Setting (page 3-22 and 3-25); Section 4.0, Project Description (new on-campus parking lots, starting on page 4-6); and Section 11.0, Transportation and Parking. Mitigation Measure 11-4, which requires preparation and implementation of a Traffic Management Plan, includes “on-campus supervision” for traffic and parking. The proposed project does not include any changes to the baseball field. No changes to the RDEIR are required.

From: **RJC JRC** <[notochslights@gmail.com](mailto:notochslights@gmail.com)>  
Date: Fri, Oct 7, 2022 at 8:29 PM  
Subject: General Comments  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[dpotter@ci.carmel.ca.us](mailto:dpotter@ci.carmel.ca.us)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

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**To CUSD board members and Superintendent Ted Knight:**

I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the **objectives** of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the **lights** is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from **noise and traffic** resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple **regulations/ordinances** but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the **alternatives** would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

## **1. Flaws in the Objectives**

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

- A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).
- B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.
- C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been [determined by lighting experts](#) to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqqyKOWRp60fDM\\_IrZgQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqyKOWRp60fDM_IrZgQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying "the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices" but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

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D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see [these recommendations for Wellesley High School stadium lighting](#). So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS: <https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games [peaking over 80 dB at Waunakee HS](#) and [over 100 dB at college games](#). The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County’s noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing *average noise levels* are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been [seen already during current Saturday afternoon football games](#). As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR



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admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces”), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

## 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 ([see map image here](#)), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 ([see map image here](#)). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:  
<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback for tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGastHtwltAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

con't.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:  
<https://drive.google.com/file/d/11XI37lwpARw8VIDjmlIXGRGjjLXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 "would cost upwards of \$72 million dollars" (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. *As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.*

Sincerely,  
RJC/JRC -- Very concerned resident of Carmel as well as future parent of Camel high school attendee!

## Response to Letter 72i, RJC JRC

1. See response to Letter 2b.

From: **RJC JRC** <[notochslights@gmail.com](mailto:notochslights@gmail.com)>  
Date: Fri, Oct 7, 2022 at 8:31 PM  
Subject: Noise Study At Night  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[dpotter@ci.carmel.ca.us](mailto:dpotter@ci.carmel.ca.us)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

**To CUSD board members and Superintendent Ted Knight:**

I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

- 1 | The noise analysis in RDEIR is flawed as it does not account for significant impacts the lights and later time of day will have on the noise of the surrounding areas. The following points were not in the Noise Analysis and need to be considered and have appropriate mitigations in place:
- 2 | - Noise distribution and traversal is dependent on the ambient temperature. The noise study does not take into account the differences in noise traversal at night versus the daytime. The noise analysis needs to consider the ambient temperature impacts and what the resulting noise level will be on the surrounding areas.
- 3 | - The noise comparison using measurements by SR-1 and other residential streets and making the conclusion that the noise would not violate the noise limits is not correct. The analysis needs to be conducted at the residential areas away from SR-1 and other streets that will bias the readings. The entire surrounding areas need to be considered in the noise analysis using measurements that are not biased by placement in proximity to street traffic.
- 4 | - Noise measurements should not be located next to the streets which cause a biased high level of sound compared to the areas away from the streets which will have significant noise from the stadium. The noise analysis should be conducted using sound measurements from the areas away from the street in the residential areas.
- 5 | - Nighttime games and practices fall at a time period when families are home in the surrounding areas making the noise a significant impact to the local residential areas with the change in time. This is not addressed in the RDEIR.
- 6 | - There are no limitations or restrictions on playing music during practices which will be very often given the frequency of expected practices. This causes a major and significant nuisance as it impacts the residential areas almost every night of the year. There needs to be mitigations that during practices no PA or music or other loud devices like PA's etc would not be allowed for any practice.

- 7 | - The noise being moved into the evenings hours increases the Leq which is not addressed in the noise report. This needs to be considered as it will have a significant impact on the Leq experienced in the residential areas as there will be noises day and night from events at the school.
- 8 | - There needs to be mitigations and limitations to the use of the PA during games. The RDEIR needs to address the use of PA and sound systems that concentrate the sound at the spectator areas with minimized noise in other surrounding areas. It is well known based on other EIR reports that the games and proximity of the residential area that if the sound equipment is not properly designed and managed it will exceed the general plan noise level. This is not addressed in the current RDEIR
- 9 | In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. *As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.*

Sincerely,

RJC/JRC -- Very concerned resident of Carmel as well as future parent of Camel high school attendee!

## Response to Letter 72j, RJC JRC

1. The commenter summarizes their concerns with the RDEIR noise analysis and what needs to be considered in order to make the analysis adequate. Each of those concerns are responded to further below. No further response is necessary.
2. The commenter states that the noise study prepared for the RDEIR does not take into account the differences in noise traversal at night versus the daytime and needs to consider the ambient temperature impacts and what the resulting noise level will be on the surrounding areas. While climatic changes can affect noise transmission, the noise levels associated with activities at the stadium would not reach a level that exceeds any applicable noise standards under any climatic condition. Please refer to Section 10.0, Noise, of the RDEIR, Appendix I thereto, and Appendix A of this final EIR, for further discussion of noise levels associated with the project. No changes to the RDEIR are required.
3. The commenter states that the noise comparison utilized in the noise study using measurements by State Route 1 and other residential streets and making the conclusion that the noise would not violate the noise limits is not correct. The commenter states the analysis needs to be conducted at the residential areas away from State Route 1 and other streets that will bias the readings. The determination that the project would not result in any exceedance of noise level standards is independent of any ambient noise level measurements that were conducted during the noise study process. That said, the ambient noise survey included locations where existing residential land uses are located near the high school. One meter (LT-4) was located near the tennis courts (and SR 1) as this is an area where project activities will be occurring (new parking lot). Ambient noise measurement site LT-3 was not located in the vicinity of any roadways and represents the residential land uses located in closest proximity to the stadium. This site was also used as a noise measurement site during the gameday noise measurements. Please refer to Section 10.0, Noise, of the RDEIR, Appendix I thereto, and Appendix A to this final EIR. No changes to the RDEIR are required.
4. See response to comment 3 above. See ambient sites LT-2 and LT-3.
5. The commenter states that the RDEIR does not address the noise impact on residential areas during nighttime games and practices when families are most likely to be home. Noise levels associated with nighttime games and practices were addressed in the RDEIR (Section 10.0, Noise) and impacts were determined to be less than significant. No further response is necessary and no changes to the RDEIR are required.
6. The commenter states that restrictions need to be placed on music being played during practices given how often practices will be held. The noise analysis contained in the RDEIR reflects a “worst-case scenario” from a noise perspective reflecting nighttime noise conditions during the most highly attended game. Noise impacts associated with nighttime



events at the stadium were determined to be less than significant. Teams currently and will continue to play music at practices and games through the existing public address system. However, that does not alter the conclusions of the RDEIR as it is likely that noise associated with nighttime practices will not be as loud as at nighttime games due to attendance, etc. Please refer to Section 10.0, Noise, of the RDEIR. No changes to the RDEIR are required.

7. The commenter states that noise being moved into the evenings hours increases the  $L_{eq}$  which is not addressed in the noise report. This is in fact addressed in the noise report (see Appendix I to the RDEIR) as well as the supplemental noise analysis (see Appendix A of the final EIR). Noise levels measured in the vicinity of ambient noise measurement site LT-3 (shown as G-1 in the supplemental noise analysis) increased by approximately 6 dB  $L_{eq}$  during the game time period, when compared to the same time window during a non-game day. However, noise levels measured during the football game at the two closest measurement sites (G-1 and G-2) were both relatively low, at 49 dB  $L_{eq}$  and 47 dB  $L_{eq}$ , respectively (see Appendix A of the final EIR). Such levels are not considered to be excessive or represent a significant impact. No changes to the RDEIR are required.
8. The commenter states that there needs to be mitigations and limitations to the use of the public address system during games. Noise levels measured during the October 1, 2022 football game (as shown in the supplemental noise analysis included in Appendix A of this final EIR) did not indicate that noise associated with the existing public address system resulted in excessive noise levels within the nearby residential areas. As described above, the noise levels measured at the two closest sites were approximately 47-49 dB  $L_{eq}$ . This includes residential land uses located at the same elevational grade as the football stadium. No changes to the RDEIR are required.
9. The commenter summarizes their opposition to the proposed project and states the proposed mitigations are not sufficient as presented in the RDEIR but does not explain how the mitigations are not sufficient. No further response is necessary and no changes to the RDEIR are required.

From: **RJC JRC** <[notochslights@gmail.com](mailto:notochslights@gmail.com)>  
Date: Mon, Oct 10, 2022 at 9:59 AM  
Subject: Re: Noise Study At Night  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[dpotter@ci.carmel.ca.us](mailto:dpotter@ci.carmel.ca.us)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

Additional details

1 Similar Stadium EIR reports have found that the noise is significant in the surrounding residential areas which contradict the analysis in the Carmel Stadium Lights EIR.

The EIR states that the CHS property is higher elevation than a number of the residential areas. A significant noise mitigation would be the placement of Acoustic-Block for Fences (<https://acoustiblok.com/acoustiblok-soundproofing-product-lines/acoustifence-noise-reducing-fences/> ) on the outermost perimeter fencing i.e. the Baseball field and parking lot areas. This is very effective at reducing noise and a number of municipalities are requiring the use of this for new sports complexes. This would also reduce the noise from baseball games as well that contribute to overall noise levels into the residential areas.

As noted below other EIR reports have found the noise to be an "annoyance and potential sleep disruption to occupants of nearby dwelling". A number of households have small children, have children that need to concentrate on studies including those that attend CHS, work off-hours and have other conditions where an increase in noise at night will have a significant impact on the household if mitigation measures are not taken. Other similar EIR reports have placed mitigations on the noises allowed during games and have also instituted and agreed to develop and enforce a good-neighbor policy for sports field events. This is an absolute requirement along with the noise mitigations on the perimeter fence of the baseball field. The EIR needs to be modified to include an appropriate good-neighbor policy (See EIR reference below) as others have implemented and the Acoustic-Block for Fences along the baseball field perimeter for noise reduction.

The CHS Stadium report does not provide a Predicted Average-Hourly Noise Level plot which has been omitted from the Carmel Stadium Lights Project. Please revise the RDEIR to include the Predicted Average-Hourly Noise Level Plot and ensure all residential areas are under the General Plan limits including noises from all hours.

Other sources of noise that are excessive need to be addressed prior to any approval of this RDEIR. The batting cages were built with no EIR conducted which was required as these have a very profound and significant effect on noise in the residential areas. They need to be immediately removed from the residential areas and a proper EIR conducted for their new locations away from the residential areas.

These items need to be addressed and mitigated before the project can move forward.

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The Articles attached below describe in detail the serious and debilitating health effects of noise pollution on human beings and negative impact on nature/wildlife. Please read all the attached articles in full.

References:

[https://www.muhsd.org/uploaded/DO/MHS Stadium Draft EIR Volume I.pdf](https://www.muhsd.org/uploaded/DO/MHS_Stadium_Draft_EIR_Volume_I.pdf)

However, onsite recreational-use activities, particularly activities involving the use of amplified sound/PA systems, would be projected to result in significant increases in ambient noise levels at nearby residential land uses. Activities occurring during the more noise-sensitive nighttime hours may result in increased levels of annoyance and potential sleep disruption to occupants of nearby dwellings.

Page 25 provides a Predicted Average-Hourly Noise Level plot which has been omitted from the Carmel Stadium Lights Project. The detailed analysis must be completed and mitigations put in place to ensure noises are mitigated at the resolutions.

Other EIRs that have found significant noise include mitigations such as noted below to ensure the noise levels are controlled.

[https://www.redlandsusd.net/cms/lib/CA01900901/Centricity/Domain/61/Final MMRP REVHS 4.25.2022.pdf](https://www.redlandsusd.net/cms/lib/CA01900901/Centricity/Domain/61/Final_MMRP_REVHS_4.25.2022.pdf)

Prior to holding the first spectator event, the District shall develop and enforce a good-neighbor policy for sports field events. Signs shall be erected at entry points that state prohibited activities during an event (e.g., use of air horns, unapproved audio amplification systems, bleacher foot-stomping, loud activity in parking lots upon exiting the field), and events shall be monitored by the District staff. During subsequent design phases of the bleachers and PA system, the District's sound system contractor shall create a Stadium Sound System Design Plan. The project's sound system design goal should be to optimize conveying information to the event attendees while minimizing off-site spill-over effects. Prior to the first sports field event, the public address system contractor shall perform a system check to verify appropriate sound levels in the seating areas, as well as minimized spill-over sound levels into the adjacent community areas.

The Articles attached below describe in detail the serious and debilitating health effects of noise pollution on human beings and negative impact on nature/wildlife. Please read all the attached articles in full.

1 in 20 Heart Attacks in Cities Linked to Noise Pollution, New Study Finds

<https://www.onegreenplanet.org/environment/1-in-20-heart-attacks-in-cities-linked-to-noise-pollution-new-study-finds/?fbclid=IwAR0S9s5n>

[https://www.newyorker.com/magazine/2016/07/04/when-music-is-violence?fbclid=IwAR1erw-rAj-iGPTzIw\\_5f8oxCCSMmKyDY\\_cyhDKqzHz8z6GvW7gFyb7xUns](https://www.newyorker.com/magazine/2016/07/04/when-music-is-violence?fbclid=IwAR1erw-rAj-iGPTzIw_5f8oxCCSMmKyDY_cyhDKqzHz8z6GvW7gFyb7xUns)

[https://en.m.wikipedia.org/wiki/Noise\\_pollution?fbclid=IwAR1kyCm7sWR-5SL\\_uqLHMjyH2GHjOEIHf2BRjXtAkaqdOt8K1OuWIMQyCw](https://en.m.wikipedia.org/wiki/Noise_pollution?fbclid=IwAR1kyCm7sWR-5SL_uqLHMjyH2GHjOEIHf2BRjXtAkaqdOt8K1OuWIMQyCw)

Sincerely,

RJC/JRC -- Very concerned resident of Carmel as well as future parent of Camel high school attendee!

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## Response to Letter 72k, RJC JRC

1. The commenter presents details on how the noise analysis was presented in two other stadium EIRs, including the Monterey High School Stadium EIR and an EIR for a stadium project in Redlands, CA, along with other unrelated news articles about the health effects of noise pollution. Although the Monterey High School Stadium and the Redlands high school stadium are not the subject of the RDEIR, the two stadium EIRs and news articles were reviewed for applicability by WJV Acoustics. The two EIRs appear to be associated with new stadiums that would be much larger than the existing CHS facility. The noise levels measured by WJV Acoustics during the October 1, 2022 game indicate that noise levels associated with football game activities were not excessively high during the game time window (see the supplemental noise analysis included as [Appendix A](#) of this Final EIR).

The noise analyses in these two EIRs are theoretical in nature, as there were no existing stadiums with existing PA systems, etc. WJV Acoustics conducted actual noise measurements during a football game at the existing Carmel High School stadium on October 1, 2022, using the existing PA system (that will not change with this project) for purposes of confirming the noise analysis previously prepared. These noise level measurements are far more definitive than any assumptive analysis. In this situation, WJV Acoustics were able to measure the actual noise produced by the PA system, by the bands playing, by the referees' whistles, by the cheering crowd, etc. These noise level measurements, conducted at numerous locations throughout the nearby residential areas, indicate that noise levels were not excessive during the game. This is the case at locations located below grade of the stadium, as well as locations at the same elevational grade as the stadium. The noise levels measured at ambient site LT-3 (indicated as G-1 supplemental noise analysis) provide the most definitive results, as this site is 1) not located in close proximity to any roadway, 2) is at the same elevational grade as the stadium and therefore no topographical acoustic shielding occurs, and 3) represents the closest residential land uses to the stadium. Noise levels were measured to be approximately 49 dB  $L_{eq}$  during the game time window. Monterey County noise standards are only provided for nighttime hours. However, most cities/counties also include a daytime noise level standard that are either 5 or 10 dB higher than the nighttime noise standards. This measured noise level of 49 dB  $L_{eq}$  would not exceed any City or County daytime noise level standard anywhere. This represents the sensitive receptor location that would be subjected to the highest noise levels and represents the "worst-case scenario" of stadium noise impacts. Noise levels associated with game activities would not be expected to be louder at any other residential location than those measured at site LT-3 (G-1). The supplemental noise analysis included as [Appendix A](#) of this Final EIR, confirmed the analysis and findings in the RDEIR.

The commenter also states that some sort of perimeter acoustic fencing should be used. Specifically, Acoustiblok is referenced. According to WJV Acoustics, such fencing treatments would do very little, if anything at all, to reduce noise levels associated with stadium events for this project. These types of acoustic treatments are effective when there is a single source location or sources that are within close proximity to each other and the noise receptor. Because the PA speakers are pole-mounted, and the bleachers (where crowd cheering noise originates and the band is playing) are located above the elevational grade of the stadium itself, acoustic fencing would not provide any noise attenuation. A noise barrier is effective when it is located either very close to the noise source or the noise receptor. These types of products are not generally used in these types of applications as they simply are not effective. Perimeter fencing and acoustic perimeter treatments would not effectively reduce noise levels in this application. If the school district to put Acoustiblok around the perimeter of the high school nearest to residential uses as a supplemental noise reduction measure, but it will be of little to no benefit from a noise perspective.

No changes to the RDEIR are required.

From: **christy ferguson** <[cferg@protonmail.com](mailto:cferg@protonmail.com)>  
Date: Mon, Oct 3, 2022 at 1:30 PM  
Subject: No Stadium Lights - Preserving our Rare and Pristine Coastal City and Habitat  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

To whom it may concern:

1 We are so fortunate to live in a rare and pristine coastal city and environs that preserve and protect our precious inhabitants - wild and human alike. We live here, many of us, because we love and respect nature in this wondrous, unparalleled place of beauty. We are surrounded and awed by the diverse migrating and native bird habitat, stars in the cosmos, wild creatures who rely on us in protecting their home and foraging areas, especially with fires and drought assaulting their ways of life as well as ours. Why on earth, one would wonder, would we, as a species, consider being so self-serving as to forget or otherwise diminish and disrespect these deserving creatures who live side by side with us in our paradise to flood their worlds and ours with harsh and unnatural lighting, to serve a small percentage of folks?

Let's work together as a community for continuous win-wins for the short and long-term. We as humans and our wild cohorts deserve nothing less.

Thank you for reading this and for considering how we may all be stewards of this precious land and sky.

Best regards,

Christy O'Connor

Sent with [Proton Mail](#) secure email.



## Response to Letter 73a, Christy O'Connor

1. The commenter expresses their general concerns about impacts to the environment. However, no comments on the RDEIR are provided and therefore, no response is necessary. A decision on the project's merits will be made by the Board, who will consider all comments.

From: **christy ferguson** <[cferg@protonmail.com](mailto:cferg@protonmail.com)>  
Date: Mon, Oct 3, 2022 at 1:52 PM  
Subject: Dark Sky Preservation - No Stadium Lights  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

To whom it may concern,

1 | I would be willing to picket if this is something that may be being considered to make an impact to promote our dark sky and protect our habitat.

If there are other ways to help, please advise.

Best regards,

Christy

Sent with [Proton Mail](#) secure email.

## Response to Letter 73b, Christy O'Connor

1. The commenter expresses their desire picket to promote dark sky and protect habitat. However, no comments on the RDEIR are provided and therefore, no response is necessary.

**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding **your** Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR include significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!

1  
con't.

**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - *Updating required school area warning signage*
  - *Consider posted speed reductions down to 15 MPH in school areas*
  - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
  - *Exploring additional stop sign controls at intersection*
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
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**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

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**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Christy O'Connor

DATE: October 3, 2022

CONTACT INFORMATION: cferg@protonmail.com



## Response to Letter 73c, Christy O'Connor

1. See response to Letter 2c and Letter 33.

From: **Mal Schwartz** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> Date:  
Mon, Oct 3, 2022 at 7:31 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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con't.

4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

-----

#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_lrzqQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_lrzqQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded



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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Mal Schwartz

[malvin.schwartz@gmail.com](mailto:malvin.schwartz@gmail.com)

24980 Outlook Drive

CARMEL, California 93923

## Response to Letter 74a, Mal Schwartz

1. See response to Letter 2b.

**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding **your** Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



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**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy –it’s part of the cumulative impact.

**Fast-track the adoption of “Late Start”, a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It’s not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a “Significant” Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it “appears” to have a adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn’t CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - Updating required school area warning signage
  - Consider posted speed reductions down to 15 MPH in school areas
  - Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps
  - Exploring additional stop sign controls at intersection
- We request that CUSD establish a baseline of a “Safe Routes to School Assessment” that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It’s basic safety.

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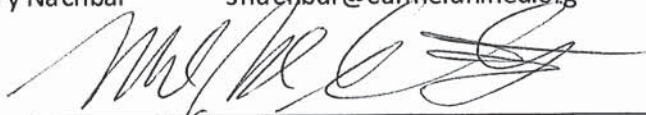
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**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
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NAME: 

DATE: 9/26/22

CONTACT INFORMATION: malvin.schwartz@gmail.com



## Response to Letter 74b, Mal Schwartz

1. See response to Letter 2c and Letter 33.

From: **Laura Tryon** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Mon, Oct 3, 2022 at 7:30 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_lrzqQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_lrzqQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded



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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
  - ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
  - iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.
- a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Laura Tryon

[buddhacat7@gmail.com](mailto:buddhacat7@gmail.com)

24980 Outlook Drive

CARMEL, California 93923

## Response to Letter 75a, Laura Tryon

1. See response to Letter 2b.

From: **Laura Tryon** <[buddhacat7@gmail.com](mailto:buddhacat7@gmail.com)>  
Date: Wed, Oct 5, 2022 at 9:30 AM  
Subject: Concerns about the proposed stadium lights at CHS To:  
[feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 | The proposal to install massive 80-foot lights at the Carmel High School football stadium will fundamentally change Carmel and have far-reaching effects across our community and natural environment:

\* Impaired Viewsheds of Iconic Coastal Areas: Four 80-foot light towers mounted on a hill will be visible from many homes and businesses both near and distant from the CHS campus, ranging from Jacks Peak, to Carmel Valley, to Point Lobos. When in use, the lights' intense glare will significantly obscure and degrade treasured coastal and valley views that are symbolic to this area, its residents and its visitors.

2 | \* Traffic & parking jams: 2000 spectators driving in on Hwy 1 to a parking lot with only 200 parking spots, most will be spilling out into the surrounding residential streets. This will be hazardous for road safety, and access by emergency vehicles.

3 | \* Noise up to 90 dB: Shouting, PA system, stomping, air horns, cars, etc., all generating 70-90 decibels, equivalent to a loud vacuum cleaner that can be heard for over ½ mile.

4 | \* Light Dome across the Night Sky: The 5.4 millions lumens from these lights will magnify up to 10x from the marine layer that is common on the Carmel coastline and will create a massive light dome that obscures the night sky and be visible to homes far from the CHS campus.

5 | \* Every Day and Night: With daily practice by multiple sports teams and public rentals provided by the Civic Center Act, this traffic/noise/light pollution can occur every weeknight a week, 365 days/year and as late as 10:00pm.

6 | \* Environmental Impact: Energy use from over 46,000 fixture watts is bad for the environment, contributes to climate change, and may disrupt nearby animals and natural habitats.

7 | \* Community Harm: With all the above negative impacts from traffic, noise and light to the beauty and tranquility of Carmel, many of the neighborhoods that can hear or see the stadium will see lower buying interest and property values for their homes.

8 | This proposal requires a thorough evaluation and public consultation process, including a well-researched Environmental Impact Report that includes input from the entire community. However, the Draft EIR is deeply flawed and vague, except in its certainty that there will be significant and unavoidable harmful impacts from these huge stadium lights that cannot be mitigated.

9 | Our group is diverse from across the greater Carmel area, including CHS parents and alumni, Carmel business owners and long-time residents. We are all here in Carmel because we have an appreciation for the unique and special place we live in, and we share a sense of responsibility to protect the incredible natural beauty for our community, future generations and the many who come visit.

What is the big deal with adding some lights for the kids?

10 Many of us are alums, parents and supporters of CHS, and we all want what is best for our kids. But lets ask ourselves this: who benefits from the football stadium lights and who is harmed?

A major objective cited in the draft EIR for installing these 80-foot football field lights is to have Friday night football games. There are 6 football home games a year and these games have been successfully held on Sat for as long as CHS has had a football team. There are also games for lacrosse and soccer, but these see much lower attendance than football. So, with only a few games, limited spectators to benefit, and a long track record of Sat afternoon games, why do we need these stadium lights all of a sudden?

Also, most of these games are expected to be attended by under 500 people, with just 1 or 2 games a year expecting up to 2000 attendees (e.g. homecoming game). However, CHS must ensure it can handle the worse case scenario, so the CUSD has allocated over \$4mm for this project, which now also includes tearing out the tennis courts and replacing it with more parking. Despite this, the parking will still be insufficient, so there is funding to pay for shuttles from offsite parking, such as Carmel Middle School. All this of course means lots more traffic along Hwy 1, and even worse, all on a Friday evening.

11 Some folks will say that lots of other schools have stadium lights too. Is Carmel really like lots of other cities though? Unlike other larger cities , including Monterey, where there is already significant light pollution, Carmel still has wonderfully dark skies at night and the communities in Carmel work very hard to protect them. For example, Carmel-by-the-Sea restricts lighting fixtures to 25 watts and no more than 10 feet above the ground specifically because "A key feature of the "forest" concept is to minimize the amount of outdoor lighting, such that the nighttime sky may be glimpsed through the trees." Similarly, Carmel Valley is actively working to get dark sky certification to protect their tranquil nights and star gazing.

With the proposed large-scale stadium lighting, light pollution will be visible throughout the Carmel area, with the fog and marine layer reflecting the lights and creating a light dome that will be visible from Jacks Peak to Point Lobos and well into Carmel Valley (see pics here). While there are only a few games a year, practice is everyday so we can expect these lights will be turned on and visible for miles on every night of every week.

12 There is a better way.

The CHS student body is growing every year, and the current CHS campus is bursting at the seams but further expansion isn't possible with the homes surround the school. It may surprise some of you to hear that the Carmel Middle School campus was actually intended to become the site of the high school when it was purchased back in 1963. With an additional 8.23 acre parcel purchased in 2018, the current CMS location has space to grow for the future. The 2019 CUSD Facilities Master Plan already envisions 6 athletic fields with lights at this location. This would be the ideal home for CHS and would enable all of its athletic programs to practice at the same time on the same campus, something that will never be possible on the current CHS campus.

13 Another argument put forth for football stadium lights is for late start. We applaud plans to switch to a later starting time, as studies have shown later start times benefit adolescent minds and improve academic results. Many schools, such as the highly ranked Junipero Serra HS, have already made this switch by adjusting their bell schedules so that the last period ends before 3pm, leaving plenty of time to have afternoon practices. Also, keep in mind that late start is starting later by just 30 mins, so the upcoming federal legislation to make daylight savings permanent will actually give students a full extra hour in the fall, which more than makes up for the 30-min later start.

With \$4.8mm allocated for this project, there should be considerable debate about this expenditure of precious public funds, especially given much better alternatives mentioned above. These funds could instead be directed towards numerous academic, arts and athletic programs to better enhance the educational experience of all students, or perhaps a new HS campus at the current CMS site that can deliver on everything we want for our kids.

Sincerely,  
Laura Tryon & Mal Schwartz  
24980 Outlook Dr., Carmel

*“Anyone who isn't confused doesn't really understand the situation.” ~ Edward R. Murrow*

## Response to Letter 75b, Laura Tryon & Mal Schwartz

1. This comment is about lighting impacts. Lighting impacts are addressed in Section 5.0, Aesthetics, of the RDEIR.
2. This comment is regarding traffic and parking. Traffic and parking is addressed in Section 11.0, Transportation and Parking.
3. This comment is about Noise. Noise is addressed in Section 10.0, Noise. See also response to Letter 2b, comment 3.
4. This comment is about lighting impacts. Lighting impacts are addressed in Section 5.0, Aesthetics, of the RDEIR.
5. This comment is about the number of days the lights could be on. See Mitigation Measures 5-2a and 5-2b in Section 5.0, Aesthetics, of the RDEIR. These mitigation measures restrict the use of the field after dark.
6. This comment is about energy use. See Section 8.0, Energy, of the RDEIR and Section 3.0, Changes to the Revised Draft EIR, in this final EIR.
7. This comment is about property home values, which is not an environmental issue. Therefore, no response is necessary. Please also see response to Letter 14-2-w, comment 4.
8. This comment is about the public consultation process. The school district followed the requirements of CEQA associated with preparation of this EIR. In addition, the school district held numerous public meetings to discuss the proposed project. For further information regarding the CEQA process and public outreach, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.
9. This comment does not raise an environmental issue and therefore, no response is necessary.
10. This comment is about the objective to hold Friday night football games and traffic associated with those games. Traffic is addressed in Section 11.0, Transportation and Parking, in the RDEIR.
11. This comment is about light pollution in Carmel and stadium lights other cities. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR. See also response to Letter 2b, comment 2. Past stadium lights projects in other cities are not the subject of the RDEIR. No further response is needed.
12. This comment is about building the project at Carmel Middle School. This is address as an alternative in Section 18.0, Alternatives, of the RDEIR.



13. This comment is about support for late start. It does not raise an environmental issue and therefore, no response is necessary. Regarding “federal legislation” see response to Letter 2b, comment 5.

**Superintendent Ted Knight**  
 VIA: **feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding **your** Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



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**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it’s part of the cumulative impact.

**Fast-track the adoption of “Late Start”, a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It’s not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it “appears” to have a adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn’t CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:
  - The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
    - Updating required school area warning signage
    - Consider posted speed reductions down to 15 MPH in school areas
    - Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps
    - Exploring additional stop sign controls at intersection
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It’s basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.



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cont.

**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Laura Tryon

DATE: 10-1-22

CONTACT INFORMATION: Buddha cat 7@gmail.com

## Response to Letter 75c, Laura Tryon

1. See response to Letter 2c and Letter 33.

From: **John Anderson** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> Date:  
Tue, Oct 4, 2022 at 5:46 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

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2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.



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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

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The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

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B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

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E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

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ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

John Anderson

[anderson1969@ymail.com](mailto:anderson1969@ymail.com)

Carmel, California 93923



## Response to Letter 76, John Anderson

1. See response to Letter 2b.

From: **Maria Anderson** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 5:45 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Maria Anderson

[anderson1969@ymail.com](mailto:anderson1969@ymail.com)

Carmel, California 93923

## Response to Letter 77, Maria Anderson

1. See response to Letter 2b.

From: **Robert Ballarini** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 6:46 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1 I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

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i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

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B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

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i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

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The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
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Date: Tue, Oct 4, 2022 at 7:27 PM

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Dana Bambace

[danabambace@gmail.com](mailto:danabambace@gmail.com)

3367 Seventh Ave

Carmel, California 93923



## Response to Letter 79, Dana Bambrace

1. See response to Letter 2b.

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Tue, Oct 4, 2022 at 4:20 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
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The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

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C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Lynn Berardo

[britishlab27@gmail.com](mailto:britishlab27@gmail.com)

24963 Outlook Lane

Carmel, California 93923

## Response to Letter 80, Lynn Berardo

1. See response to Letter 2b.

From: **Christopher Bone** <[cbone68@yahoo.com](mailto:cbone68@yahoo.com)>  
Date: Tue, Oct 4, 2022 at 3:33 PM  
Subject: Feedback on the EIR - Let there be lights.  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

CUSD Board,

1 | I am Clark Bone, a parent of two teens at Carmel High School and a homeowner in Rancho Rio Vista near the high school. I want to express my full support for the initiatives proposed by the school board in the revised EIR. I believe that the revised EIR is a more comprehensive report and I applauded the CUSD leadership for realizing a better EIR was required.

The ability for Carmel students who desire to participate in sports is an important part of their life-long develop. Participating in organized sports is a very effective way for these students to develop leadership, resiliency, mental and physical toughness, the importance and value of teamwork, sharing of responsibility, and how to win as well as lose with grace. These are all life-long skills they will carry with them through life. These are the skills that I learned on the field as a student athlete many years ago (although not in Carmel). Carmel High School's defined mission is to help all students reach their full potential as human beings, lifelong learners, and citizens of a global society. This does not all occur in a classroom, but also on a field, track, court, or pool.

I realize that you are probably getting much more negative feedback, but I ask that you continue on with your efforts. I firmly believe that there is great support for what you are doing and the the opposition, while vocal, is not representative of the entire community, but of privileged few.

Clark Bone

## Response to Letter 81, Christopher Bone

1. The commenter expresses support for the proposed project, but does not comment on the RDEIR. A decision on the proposed project's merits will be made by the Board, who will consider all comments. Therefore, no response is necessary.

From: **Seth Busino** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 4:28 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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Seth Busino

[sethbusino@gmail.com](mailto:sethbusino@gmail.com)

25509 Flanders Dr

Carmel, California 93923



## Response to Letter 82, Seth Busino

1. See response to Letter 2b.

From: **Nancy Collins** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> Date:  
Tue, Oct 4, 2022 at 4:12 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_IrZgQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_IrZgQMfTarGEWSS2/view?usp=sharing)

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

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i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded



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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

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C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Nancy Collins

[ncollins224@yahoo.com](mailto:ncollins224@yahoo.com)

PO BOX 3572

CARMEL BY THE SEA, California 93921-3572

## Response to Letter 83, Nancy Collins

1. See response to Letter 2b.

From: **Molly Cybuck** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> Date:  
Tue, Oct 4, 2022 at 9:45 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

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3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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Molly Cybuck

[molly.cybuck@gmail.com](mailto:molly.cybuck@gmail.com)

Lincoln & 7th, Po Box 5981

Carmel, Kansas us, 93921

## Response to Letter 84, Molly Cybuck

1. See response to Letter 2b.

From: **jennifer dianto** <[jenniferdianto@yahoo.com](mailto:jenniferdianto@yahoo.com)>  
Date: Tue, Oct 4, 2022 at 7:53 PM  
Subject: Support for Carmel High School Stadium Improvements  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Dear District Leadership,

1 | I'm writing as a parent of two children in the Carmel Unified School District. I would like to submit this email as my support for the Carmel High School Stadium Improvements. I have reviewed the Revised Draft EIR and found the document to be comprehensive and thorough. Thank you for your attention to this matter. I am aware of local campaigns and tactics that are misleading to residents of Carmel, notably language at [savecarmel.org](http://savecarmel.org) that states, 'the RDEIR is over 394 pages and designed to obfuscate the significant impacts that would result from this ill-conceived project.'

I strongly disagree with this assertion. I found the document to be clear, and the outreach and engagement opportunities put forth by CUSD to be more than satisfactory.

As a ten year resident of Carmel, I look forward to seeing the improvement plan move ahead as it will provide a more safe and accessible space for our children and families to enjoy sports ultimately improving our mental and physical health.

Thank you,  
Jennifer Dianto Kemmerly



## Response to Letter 85, Jennifer Dianto Kemmerly

1. The commenter expresses support for the proposed project, but does not raise an environmental issue. A decision on the project's merits will be made by the Board, who will consider all comments. Therefore, no response is necessary.

From: **Alec Duarte** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 8:13 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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i. Distributed multi-zone PA speaker system

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i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

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The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

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a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Alec Duarte

[alecduarte@sbcglobal.net](mailto:alecduarte@sbcglobal.net)

73 West Garzas

Carmel Valley, California 93924

## Response to Letter 86, Alec Duarte

1. See response to Letter 2b.

From: **Bryan Duarte** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> Date:  
Tue, Oct 4, 2022 at 8:10 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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Bryan Duarte

[bryanduarte94@yahoo.com](mailto:bryanduarte94@yahoo.com)

3367 7th Avenue

Carmel, California 93923

## Response to Letter 87, Bryan Duarte

1. See response to Letter 2b.

From: **Harriett Duarte** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>

Date: Tue, Oct 4, 2022 at 8:12 PM

Subject: Public Comment on RDEIR for CHS Stadium

Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

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iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

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The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

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C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

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i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

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B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Harriett Duarte

[moonbowhad@aol.com](mailto:moonbowhad@aol.com)

73 West Garzas

Carmel Valley, California 93924



## Response to Letter 88, Harriett Duarte

1. See response to Letter 2b.

From: **Olivia Duarte** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> Date:  
Tue, Oct 4, 2022 at 4:05 AM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

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B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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Olivia Duarte

[olivia\\_d@yahoo.com](mailto:olivia_d@yahoo.com)

Carmel, California 93923

## Response to Letter 89, Olivia Duarte

1. See response to Letter 2b.

From: **Jeannie Ferrara** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>

Date: Tue, Oct 4, 2022 at 11:24 PM

Subject: Public Comment on RDEIR for CHS Stadium

Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.



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con't.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
  - ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
  - iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.
- a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Jeannie Ferrara

[jeannieferrara@gmail.com](mailto:jeannieferrara@gmail.com)

25 Via Ventura

Monterey, California 93940

## Response to Letter 90, Jeannie Ferrara

1. See response to Letter 2b.

From: **Lauren Haase** <[haaselauren@yahoo.com](mailto:haaselauren@yahoo.com)>

Date: Tue, Oct 4, 2022 at 9:34 AM

Subject: demolition of CHS tennis courts

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Hello,

1 | I have read some of the documents for this project but wanted to know more about what would be done to replace these tennis courts. The general public is coming up to me and telling me that the CHS principal is telling them that the courts will be gone by this coming spring 2023. If this is true, this seems like a very short time to provide an alternate site for the high school teams to compete in tennis.

For the high school teams to compete using the Middle School courts in their existing condition would be very problematic. The CMS courts are bare asphalt, slippery for players who hit the ball harder, compete at a faster pace and are sprinting at high speeds around the courts. It is basically dangerous. In the spring, the middle school program also has a lot of kids so to have both the high school boys and the middle school teams using the 4 courts there, would be difficult. There are obstacles to overcome to have a high school coach coming down to CMS, with no storage facility there, which requires bringing all their own equipment each day. (ball hoppers, ball machine, equipment, rackets, first aid, new balls to host matches, scorecards, etc)

Is it possible for the general public and the district tennis coaches to see the plans to replace these courts that are being removed?

Thank you for your consideration.

Lauren Haase  
CHS Girls Assistant Tennis Coach



## Response to Letter 91, Lauren Haase

1. The commenter addresses their concerns with removing the existing tennis courts at the high school. The tennis courts are proposed to be replaced with additional on-campus parking, in response to the neighbors' concern about students parking in the neighborhoods. With implementation of the proposed project, tennis practice would be held at the existing Carmel Middle School tennis courts. Tournaments would continue to be held off-site at Carmel Valley Athletic Club and Mission Ranch. Please refer to Section 4.0, Project Description, of the RDEIR. This comment does not raise an environmental issue and therefore, no further response is necessary.

From: **Diana Losch** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 4:18 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_lrzqQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_lrzqQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

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B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Diana Losch

[diana@essentialize.net](mailto:diana@essentialize.net)

24501 Via Mar Monte, Unit 80

Carmel-by-the-Sea, California 93923

## Response to Letter 92, Diana Losch

1. See response to Letter 2b.

From: **don macvicar** <[dmacvicar00@yahoo.com](mailto:dmacvicar00@yahoo.com)>  
Date: Tue, Oct 4, 2022 at 3:43 PM  
Subject: proposed stadium lights  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

To CUSD board members and Superintendent Ted Knight:

1 Our kids both attended Carmel High School. They participated in sports and attended sporting events. Throughout our six years at CHS we never missed having stadium lights. Our family had a full High School experience in a uniquely beautiful and natural setting. Football, PE classes, Powder Puff and homecoming events—nothing was hindered by the lack of stadium lights. Our children are 30 and 32 now and both are still athletes. Stadium lights would not have improved their experience, but would have changed the incredible opportunity they enjoyed of going to school in a forested area known for its dark skies, quiet nights, and rural appeal.

Please stop the madness of literally changing the atmosphere of Carmel and the surrounding areas. There is a reason Carmel is different. There is a reason people give up so much and work so hard to live here and visit here.

Remember, as well, that to some degree our students have been protected from nighttime driving and walking in a very dark neighborhood and campus. The stadium lights will only welcome students and crowds that come and go in darkness for those newly scheduled events. Please don't make this change that is so unnecessary and harmful to our town.

Sincerely,

Donald MacVicar  
Carmel, CA

## Response to Letter 93, Don MacVicar

1. The commenter expresses their opposition to the proposed project but does not comment on the RDEIR. A decision on the project's merits will be made by the Board, who will consider all comments. Therefore, no response is necessary.

From: **Mary MacVicar** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 3:15 PM  
Subject: Public Comment on proposed CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

Both of my children attended Carmel High School, participated in sports, and attended sporting events. Throughout our years at CHS we never missed having stadium lights. Our family had a full High School experience in a uniquely beautiful and natural setting. Football, PE classes, Powder Puff and homecoming events, nothing was hindered by the lack of stadium lights. Both of my children are adults now and are still athletes. Stadium lights would not have improved their experience, but would have changed the incredible opportunity they enjoyed of going to school in a forested area known for its dark skies, quiet nights, and rural appeal.

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Sincerely,

Mary MacVicar

Mary MacVicar  
[mdmacvicar@yahoo.com](mailto:mdmacvicar@yahoo.com)

Carmel, California 93923



## Response to Letter 94a, Mary MacVicar

1. The commenter expresses their opposition to the proposed project but does not comment on the RDEIR. Therefore, no response is necessary.

From: **Mary MacVicar** <[mdmacvicar@yahoo.com](mailto:mdmacvicar@yahoo.com)>  
Date: Tue, Oct 4, 2022 at 3:22 PM  
Subject: stadium lights project  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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Please stop the madness of literally changing the atmosphere of Carmel and the surrounding areas. There is a reason Carmel is different. There is a reason people give up so much and work so hard to live here and visit here.

Sincerely,

Mary MacVicar  
Carmel, CA

## Response to Letter 94b, Mary MacVicar

1. The comment is repetitive of general comments previously stated by the commenter. Please refer to response to Letter 94a.

From: **Elsa Mead** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 3:54 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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con't.

4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_IrzgQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_IrzgQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.



i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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con't.

when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Elsa Mead

[elsa.mead@gmail.com](mailto:elsa.mead@gmail.com)

Junipero 3SW, 4th Av

Carmel by the Sea, California 93921

## Response to Letter 95, Elsa Mead

1. See response to Letter 2b.

*Comments on the Revised Draft Environmental Impact Report by Allen Miller*

The Carmel Unified School District issued a revised draft environmental impact report (RDEIR) on August 24, 2022. This document contains comments on the following topics addressed in the report: lights, visual simulations, noise, and the alternative of a lighted stadium at the Middle School (Alternative 4). The comments identify deficiencies in the report and suggest ways to correct them.

References to pages in the RDEIR and its appendices are the page numbers of the Adobe Acrobat files that contain them. Where possible, the references also show the page numbers that appear in the report.

**Lights**

The RDEIR fails to say that the middle set of lights on each pole around the football field are aimed up. The middle set will be ten feet below the main set of lights at the top of each pole. Appendix C (page 3) identifies these luminaires as type TLC-BT-575, and Musco's datasheet for this luminaire shows them aimed up. Appendix D (page 3) says that 7.7% of the lumens produced by the field lighting will be aimed up.

The following photograph shows the stadium lights at Seaside High School. They are similar to those proposed for Carmel High School. They have lights aimed up about a third of the way up the poles. Because the picture was taken above the field, the lights aimed up appear brighter than the lights focused on the field. People who live above Carmel High School will experience the same effect.



Aiming lights up is inappropriate in a coastal environment where there is a significant amount of marine moisture in the air. Light that is aimed upward, plus light reflected from the field, can be scattered by the moisture creating a light dome. The dome can extend far beyond the field, as the following photographs of the pool lights demonstrate.



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The light measurements described in the RDEIR and Appendix C were taken at or near ground level. They do not measure the effect of lights aimed upward. (The measurements must have been made elsewhere since the lights to do not currently exist at Carmel High School.)

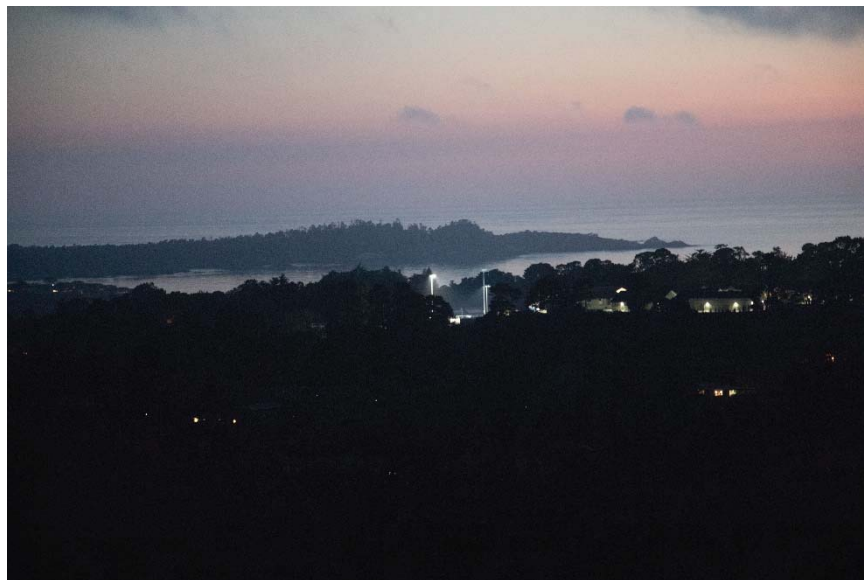
The only solution is to eliminate the lights aimed upward. There is no practical way to block them or the reflected light that they generate from being seen by people living near the high school. If lights aimed up are considered essential for some sports, then practice and competition for those sports should occur in the daytime.

2

### *Visual Simulations*

The visual simulations contained in the RDEIR and Appendix F were done on a clear day and a clear night. They fail to account for the effect of the lights at sunset or in foggy weather. The light domes created by the lights in foggy weather are described above.

Sunsets are special part of the local environment. Tourists come to the Monterey Peninsula and Big Sur Coast to see the sunset. They often line the sides of the road in Pacific Grove, Carmel and Highway 1 at sunset. Anything the lights do to obscure or detract from the sunsets alters the character of our neighborhood and its attractiveness for residents and visitors. The existing pool lights already interfere with our sunsets as shown in the following picture. This picture was taken from Key Observation Point 4 on Outlook Drive.



2  
con't.

The solution is to create simulations that show the high school at sunset and in foggy weather. This will require new pictures of the high school and simulated stadium lights under those conditions. The simulated stadium lights for foggy conditions should show a realistic light dome in addition to the lights and poles.

3

### *Noise*

The noise measurements described in the RDEIR and Appendix I describe existing ambient noise levels. No attempt was made to measure noise created during a football game or any other sport. In particular, noise created by the public address system at the Carmel High School stadium was not measured, and no alternatives for mitigating this noise were considered. That is unfortunate since a public address system often creates some of the loudest and most sustained noise at an athletic event. It is easy to measure the noise from a public address system. All that is needed is a recording of announcements at a typical event.

Other school districts have measured noise from their public address systems and devised ways to minimize it. The main mitigation measure is to use “distributed speakers.” A distributed speaker system uses many small speakers instead of a few large ones. The small speakers are distributed next to the bleachers so every spectator is near a speaker. That allows the schools to operate the speakers at a much lower volume than is required for a few large speakers. Measurements at other school districts show that the noise from the speakers is significantly reduced in the surrounding neighborhood.

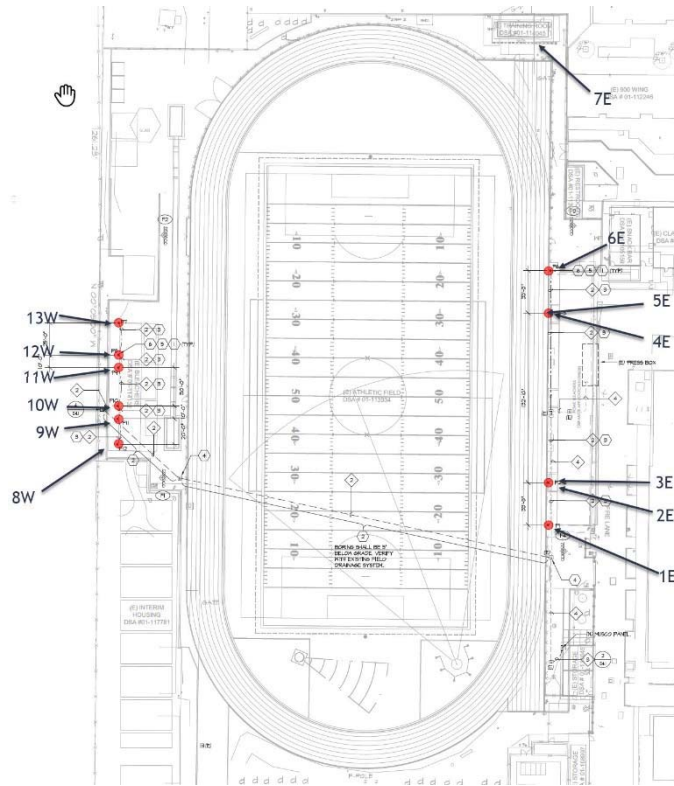
A good example of distributed speakers are the ones installed at Los Altos High School. They were installed at the same time that the school installed stadium lights. Here is a picture of one of their speakers.



The stadium at Los Altos High School has thirteen of these speakers. Their placement was designed to provide adequate sound volume to everyone in the stadium while minimizing sound

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con't.

projected into the surrounding neighborhood. Their placement is shown in the following drawing.



Here is a picture of the speakers mounted on poles next to the stadium bleachers.





3  
con't.

The RDEIR fails to consider ways to reduce the noise from night athletic events in the surrounding neighborhood. The solution is for Carmel High School to design a speaker system for their stadium similar to the one in Los Altos and test its effectiveness before enabling night games. They should also consider and evaluate other noise suppression measures like attaching sound deadening material to the underside of the bleachers.

4

***The Middle School Alternative (Alternative 4)***

Alternative 4 in the RDEIR defines the option of a lighted stadium at the Carmel Middle School in almost the most expensive and disruptive way possible. It assumes that all of the playing fields and tennis courts at the Middle School will be moved to new locations. That includes the existing football field and track. Alternative 4 moves them next to an approved housing development, Rancho Canada Village, potentially placing 130 new houses close to the lights.

Here are the current locations of the fields and tennis courts at the Carmel Middle School.



4  
con't.

Here is an image from the RDEIR showing where Alternative 4 places the fields and tennis courts.



This relocation of the Middle School’s athletic facilities is expensive. The RDEIR says that “these improvements would cost upwards of \$72 million dollars” (page 358, 18-18).

This is not a serious attempt to evaluate the option of a lighted stadium at the Middle School. It has the appearance of an alternative that was designed to be unacceptable.

The solution is to define another alternative that puts stadium lights and bleachers at the existing Middle School field and track. It will cost far less than Alternative 4, and it will cause significantly less ecological damage than moving all the playing fields and tennis courts.

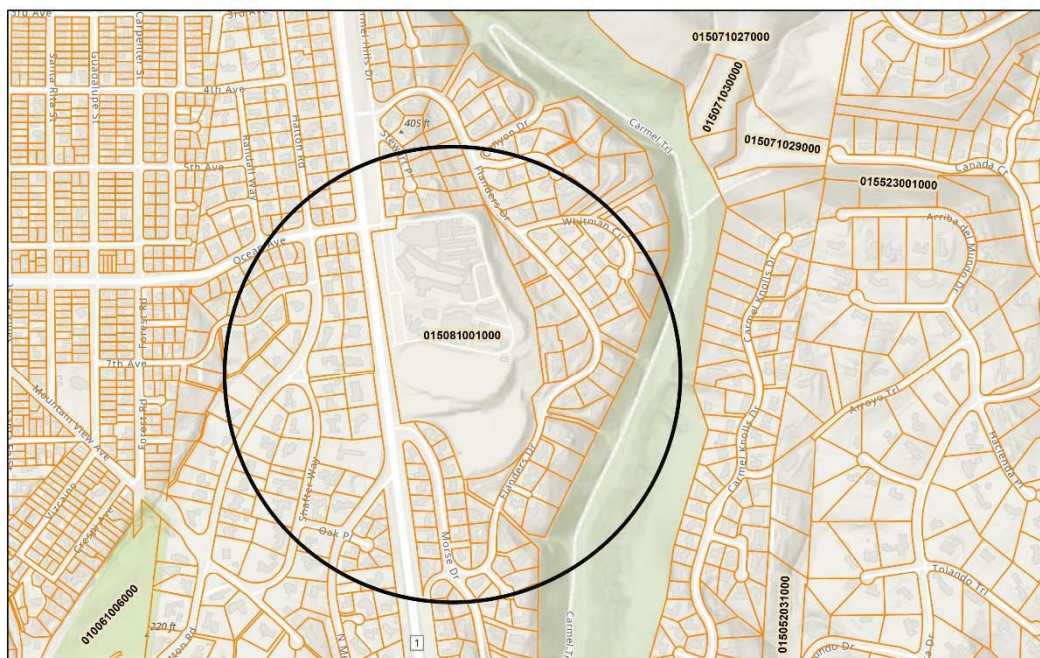
In evaluating the aesthetics of Alternative 4, the RDEIR says that a lighted stadium at the Middle School “would have greater levels of aesthetic impacts as compared to the proposed project as there is currently no stadium at the middle school while there is already an existing stadium at the high school” (page 364, 18-24). It also says “This alternative would also add lights to a campus without lighted athletic facilities, whereas Carmel High School has existing pool lights” (page 365, 18-25). The argument is that the High School has already impacted the surrounding neighborhood so increasing that impact is somehow more acceptable than impacting another area.



A better way to compare the impacts of lights at the High School and Middle School is to estimate the number of people who would be most affected by them. They are the people who live close to the schools. As the following maps demonstrate, there are far more people living close to the High School than the Middle School.

The first map shows the parcels of land and buildings surrounding the Carmel High School. Almost all of the buildings near the High School are residential houses. The people living in them are the ones most affected by the noise, light, traffic, and parking associated with the proposed stadium lights. The high density of houses around the High School is obvious from the map. There are many ways to measure that density. For example, there are about 152 houses within a quarter mile of the High School stadium, as shown by the circle around the stadium.

Carmel High School



Parcels

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0 0.05 0.1 0.2 mi  
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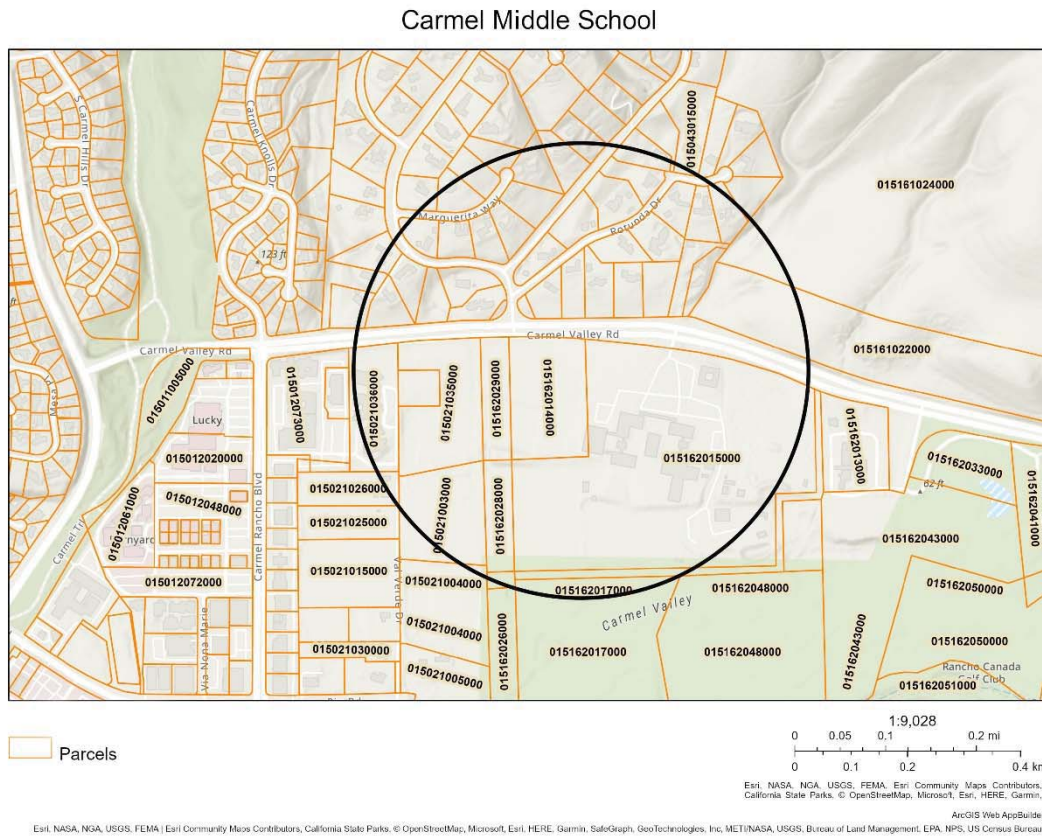
Esrri, NASA, NGA, USGS, FEMA | Esri Community Maps Contributors, California State Parks, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, ArcGIS Web AppBuilder  
Esri, NASA, NGA, USGS, FEMA | Esri Community Maps Contributors, California State Parks, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau.

The second map shows the parcels of land and buildings surrounding the Carmel Middle School. This map has the same scale as the previous one. Many of the parcels of land around the Middle School do not have houses on them. The density of houses around the Middle School is obviously much less than it is around the High School. There are only about 29 houses within a quarter mile of the existing Middle School field, as shown by the circle around it. In addition, there is an assisted living facility with 57 rooms, the Cottages of Carmel, a quarter mile west of the existing track and field. The location of the 130 new houses in an approved housing



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development, Rancho Canada Village, south of the Middle School is unknown. However, it is unlikely that any of them will be within a quarter mile of the field.

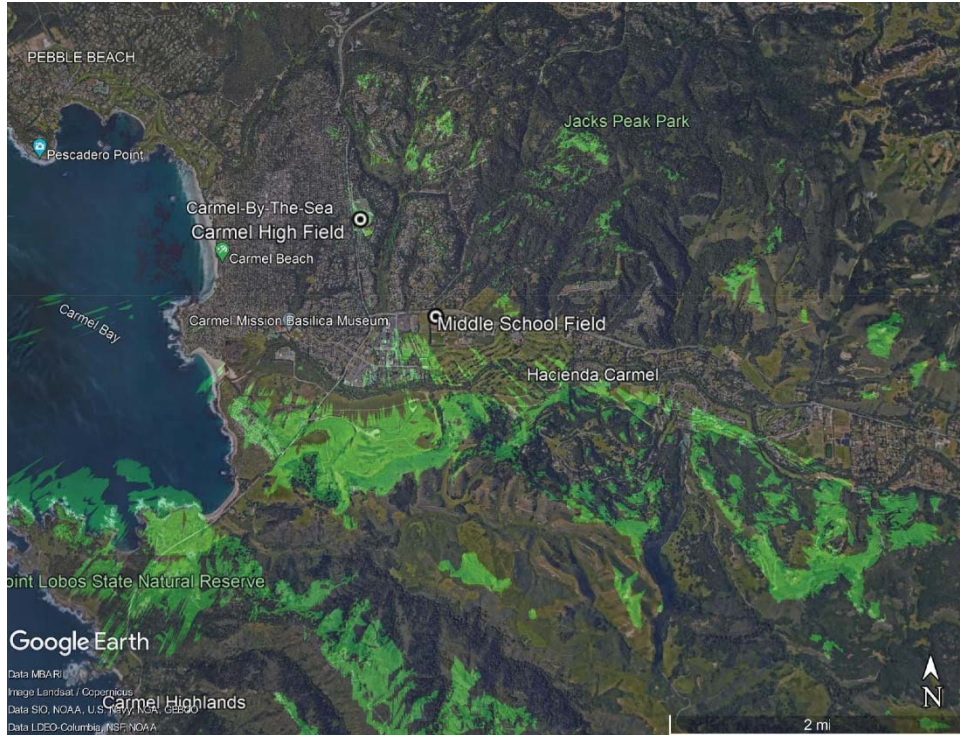


Some estimates are required to compare the number of people next to the High School and Middle School. If the average occupancy rate for the houses near both schools is two and the average occupancy rate for rooms in the Cottages of Carmel is one, it means that about 304 people live near the High School lights and 115 people will live near the Middle School lights. Better data on occupancy rates will change these numbers somewhat, but they will not change the conclusion that many more people will be close to the High School lights.

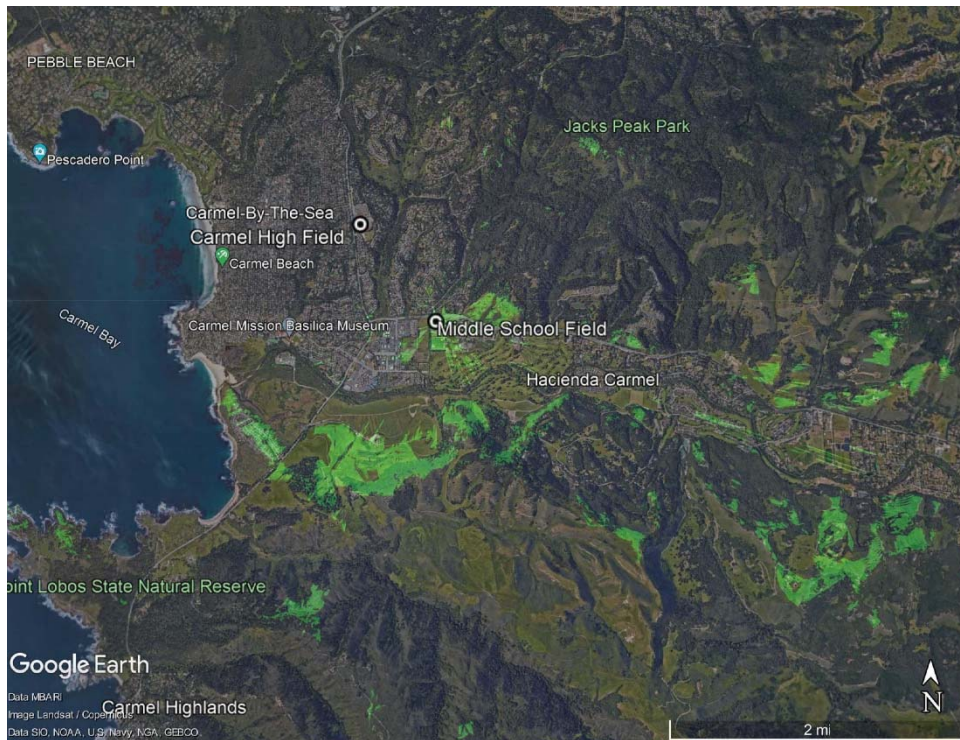
6

Another way to evaluate the aesthetics of Alternative 4 is to consider how far stadium lights at the Middle School field could be seen. The Middle School is in a valley that confines the light to a relatively small area. In contrast, the High School is on a ridge that allows light to be seen far away. The viewshed feature of Google Earth calculates that light from High School can be seen in all the areas shaded green in the following aerial photograph.

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con't.



The same aerial photograph shows that the light from the Middle School is confined to a much smaller area.



It is obvious from these two aerial photographs that the lights at Carmel High School will be seen in many more places than lights at the Middle School. Carmel Unified School District

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con't.

should consider extending this analysis by estimating the number of residential houses in the areas shaded green for both schools. That would enable estimates of the number of people who will see the stadium lights at both locations. It would complement estimates of the people affected by noise, light, traffic, and parking due to their proximity to the schools.

7

### *Summary*

The following actions are needed to correct deficiencies in the RDEIR.

1. Eliminate any luminaires aimed up or sideways from the stadium lights proposed for Carmel High School. If these luminaires are considered essential for some sports, then schedule practice and competition for those sports during the daytime.
2. Create simulations that show Carmel High School's lights at sunset and in foggy weather using new pictures of the high school and simulated stadium lights under those conditions. The simulated stadium lights for foggy conditions should show a realistic light dome in addition to the lights and poles.
3. Identify and evaluate ways to reduce the noise from night athletic events heard in the surrounding neighborhood. Design a speaker system for the Carmel High School stadium similar to the one in Los Altos and test its effectiveness before enabling night games. Identify and evaluate other noise suppression measures like attaching sound deadening material to the underside of the bleachers.
4. Define another alternative that puts stadium lights and bleachers at the existing Middle School field and track. Provide a realistic evaluation of the aesthetics of this alternative based on the number of people who will be affected by stadium lights at that location.



## Response to Letter 96, Allen Miller

1. The commenter addresses the proposed stadium light design and their concern for the potential of “up lighting” from the middle set of lights on each pole. See response to comment 2b, comment 2, including the attachment titled Lighting Aerial Sports Environmental Sensitivity. As the commenter states, the RDEIR in Appendix C and D give detail regarding this up lighting. The RDEIR determined that the proposed project’s lighting impact, including sky glow, would be significant and unavoidable.
2. The commenter addresses the visual simulations and states they fail to account for the effect of the stadium lights at sunset or in foggy weather. See response to comment 2, under “Atmospheric Conditions,” for Letter 2b for a discussion of the effects of the marine layer and fog on lighting conditions. No changes to the RDEIR are required.
3. The commenter addresses noise generated by the existing public address system at the stadium. No changes or modifications to the existing public address system are proposed as part of the project. However, the noise measurements taken by WJV Acoustics as part of the supplemental noise analysis, included as Appendix A of this final EIR, included noise generated by the stadium’s existing public address system at a home football game in October 2022. The supplemental analysis confirmed the findings of the noise analysis conducted for the RDEIR (see Section 10.0, Noise), which determined that operational noise impacts (including nighttime stadium events) as a result of the proposed project would be less than significant. See also response to comment 4 for Letter 58b for additional discussion of result of the noise measurements taken as part of the supplemental noise analysis. Significant impacts were not identified, and therefore, no mitigation measures are required. No changes to the RDEIR are required.
4. The commenter addresses possible changes to Alternative 4 to move the lighted stadium and tennis courts closer to Carmel Valley Road at the site of the existing track and field. For purposes of the alternatives analysis, the RDEIR utilized the school district’s 2019 Facilities Master Plan, which shows the stadium along the southern border of the campus, as presented in this comment letter and in Figure 18-4 of the RDEIR. The commenter indicates that a high school regulation sized stadium could be constructed using the area occupied by the existing middle field track and field. However, construction of a lighted, high school stadium at the middle school would require more area and reorganizing some of the other facilities. Finally, for purposes of considering the environmental impacts of a lighted stadium at Carmel Middle School, constructing the lighted stadium at any other location within the middle school property would result in the same or similar environmental impacts. Please also see responses to Letter 2c, comment 22, Letter 14-1-g, comment 4, and Letter 14-2-g, comment 2. No changes to the RDEIR are required.

5. In addition, the commenter compares the number of people who would be impacted by the stadium lights project at the high school versus the middle school as a way to evaluate and compare the level of environmental impacts between the proposed project and Alternative 4. See response to comment 4, above, and response to comment 5 (under “Alternative 4, Lighted Stadium at Carmel Middle School”) for Letter 2b. No changes to the RDEIR are required.
6. Comment noted. Regarding the extent of impact of the stadium lights, see response comment 2 of Letter 2b (under “Visual Assessment of Lights”). No changes to the RDEIR are required.
7. The commenter provides a summary of their perceived deficiencies of the RDEIR, which are responded to above. No further response is necessary.

**Response to the RDEIR by Susan Miller**

1

**I am responding to the overall approach, objectives and alternatives considered in the Revised Draft Environmental Impact Statement Report (RDEIR).**

**School officials are proposing to spend \$4.5 million dollars on stadium lights and associated projects for football practices and Friday night games. School officials keep stressing they want what's best for students.**

**Excuse me?**

**We ALL want what's best for students. We just happen to differ on "what's best" and WHICH students will benefit.**

**The huge outlay proposed in the RDEIR supposedly will benefit the small number of male students who play football. Some students say Friday night games will bolster school spirit.**

**There is no suggestion in the RDEIR that playing football at Carmel High School will lead to college recruitment and scholarships.**

**Meanwhile, the RDEIR says nothing about the danger of concussions to football players that lead to later brain damage as adults. It is silent even on the difficulty of getting ambulance crews into the parking area next to the stadium.**

**As public awareness of the danger of football concussions grows, a recent New York Times article (Oct. 1, 2022) noted that "more parents are pushing their sons into soccer and baseball. Scholastic football programs have shrunk and even shuttered."**

**Consider the risk of life-altering brain damage so that spectators can enjoy football games: Is this really "what's best for students"?**

**There is nothing in the RDEIR to suggest other ways in which school spirit might be enhanced. How about supporting and celebrating all the OTHER sports—female and male—that are much less likely to lead to concussions? How about celebrating all the OTHER artistic and intellectual activities in which Carmel students excel?**

**Have students, parents and faculty been polled on what OTHER programs and services they would like funded, such as more Advanced Placement classes, more counseling, more faculty, or other extracurricular activities?**

**There is nothing in the RDEIR to analyze alternative uses of the \$4.5 million. The school's mock trial team is headed for the national championships in Chicago. That is, if they can raise enough money for**



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travel, hotel and other expenses. They have turned to the community for help. I've given them a large donation and urged my neighbors to do the same. Practicing and preparing for mock trial competitions develops skills in thinking, reasoning, public speaking, and leadership. All of these skills enhance students' abilities to gain admission to—and do well in—top colleges. Carmel's mock trial teams make the nationals year after year. Why is no money set aside in the school district budget to pay for these expenses?

Is this an example “what’s best for students”?

School officials have been misleading, dismissive and duplicitous in statements to the community. Supt. Ted Knight convened a “listening session” in December to hear from residents.

Neighbors complained about:

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–Light pollution, which will put four 80-foot spotlights between the ocean views and thousands of homes stretching from Point Lobos to Jack’s Peak, including Carmel Highlands, Carmel Valley, Palo Corona, Carmel Views, Rancho Rio Vista and Carmel Knolls. Residents west of Highway 1 will also be affected by light pollution from these poles. (See page 127, RDEIR.)

–Frequency of light pollution. There could be up to 400 practices for 124 soccer and football games, NOT just the “six” football games frequently mentioned by supporters of the lights. (See page 103, RDEIR.)

3  
–Traffic from 1,500 spectators backed up onto Highway 1 during Friday rush hour. (See page 104, RDEIR.)

4  
–Lack of emergency access routes for games, noise pollution, and safety of students and spectators who will be parked on unlit, narrow streets adjacent to the school. (No mention of these concerns in RDEIR.)

5  
–Destruction of Monterey cypress and pine trees adjacent to Highway 1, a designated California Scenic Highway. (See page 199, RDEIR.)

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Knight said all these comments would be taken into account as the board moved forward. He responded to criticisms and questions about the intensity of proposed stadium lights—and the existing swimming pool lights—by saying that the swimming pool lights would be converted to “dark sky” lights over the summer of 2022. He implied this change would be a good way for residents to compare current lights with a “dark sky” version. Now, the RDEIR has delayed “dark sky” pool lighting until football stadium lights are installed. Residents’ frequent requests for “story poles” mounted with lights (to indicate how high and bright the stadium lights would be) have been ignored. Two days after the “listening

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session” Knight was quoted in the student newspaper saying that he hoped something could be worked out to partially satisfy residents’ concerns. However, he assured the students, in the end, the district would do whatever the students wanted.

7

Fundamentally, the RDEIR does not accurately justify why stadium lights are necessary. School officials have blamed the new state law that mandates a later start for high school students so they can get more sleep. They say the district can’t manage a busing schedule without ending school so late in the afternoon that lights are necessary for evening athletic practices. They admit this schedule would require picking up elementary students an hour earlier. However, the link to late start doesn’t hold up.

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Numerous residents have provided school schedules that include the current seven-period day AND late start AND still conclude in plenty of time for athletic practices in the daylight. However, if the district wants to keep elementary student busing on the current schedule, the district could simply purchase more buses and hire more bus drivers. Surely that would be considerably less expensive than \$4.5 million.

At this point, considering the many other alternatives to boosting school spirit and athlete safety, and the very workable alternatives to providing a late start schedule, the stadium lights and associated projects amount to a solution to no real problem.

## Response to Letter 97, Susan Miller

1. Comment noted. This comment is regarding the project costs, students that will benefit, danger of concussions, and other non-environmental issues outside the scope of the RDEIR and the CEQA process. A decision on the project's merits will be made by the Board, who will consider all comments. Please also refer to response to Letter 14-1-g, comment 3. It also raises the issue of on-site circulation and safety. Regarding on-site circulation and safety, see response to Letter 14-2-f. No additional response is necessary.
2. This comment is about light pollution, which is addressed in Section 5.0, Aesthetics of the RDEIR. Regarding the number of practices and games, see response to Letter 2b, comment 2. No changes to the RDEIR are required.
3. This comment is about traffic on State Route 1. Traffic, access, and parking is addressed in Section 11.0, Transportation and Parking, of the RDEIR. With implementation of the traffic management plan, which is required as a mitigation measure (11-4) traffic operations at the high school would work acceptably. Please see further discussion in the RDEIR starting on page 11-14. No changes to the RDEIR are required.
4. The commenter addresses lack of emergency routes for games, noise pollution, and safety of students and spectators parking in unlit, neighborhood streets. Regarding emergency access routes, ingress and egress, as well as internal circulation, for everyday or for emergencies is presented in Figure 4-1, Overall Site Plan, and Figure 4-6, Post Development Overall Parking Exhibit, and discussed further in Section 11.0, Transportation and Parking. See also response to Letter 14-2-f. Mitigation measure 11-4 requires preparation and implementation of a detailed traffic management plan. With implementation of this plan, parking during the most highly attended events would not result in a significant environmental impact or emergency access issues. Noise impacts are addressed in Section 10., Noise, of the RDEIR. The commenter expresses concerns over pedestrian and circulation safety on the streets surrounding Carmel High School as a result of students and spectators parking on unlit, narrow streets. The proposed project includes the addition of 111 on-site parking spaces. Circulation hazards are addressed in Section 11.0, Transportation, of the RDEIR and through implementation of the traffic management plan as outlined in mitigation measure 11-4. No changes to the RDEIR are required.
5. The commenter addresses the potential removal of Monterey cypress and pine trees adjacent to State Route 1 as a result of the proposed project. The commenter references page 199 of the RDEIR electronic version (page 7-3, Figure 7-1, Habitat Map). The specific figure referenced does not show any trees proposed for removal. No tree removal is planned as part of the proposed project; although the potential for tree removal as a result of the proposed project is addressed in Section 7.0, Biological Resources, of the RDEIR. No changes to the RDEIR are required.

6. This comment is about replacement of the existing pool lights with Dark-Sky Certified lights. The proposed project includes retrofitting the existing pool lights to reduce their impact with new LED, Dark-Sky certified lights. There is no requirement for the pool lights replacement to wait for installation of the stadium lights. Regarding story poles, see response to Letter 2c, comment 1.
7. This comment is about the late start law. It does not raise an environmental issue and therefore, no response is necessary.
8. The commenter addresses proposed school schedules and alternatives to boosting school spirit and safety provided by numerous residents but does not address an environmental issue. Moreover, CEQA does not require that an agency consider alternatives to a component of a project, and should instead focus on alternatives to the project as a whole (*Calif. Native Plant Soc’y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 993.) Therefore, no response is necessary.

From: **Noel Mills** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 4:18 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact



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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyKOWRp60fDM\\_IrZgQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyKOWRp60fDM_IrZgQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Noel Mills

[atatarat@yahoo.com](mailto:atatarat@yahoo.com)

25490 flanders drive

Carmel, California 93923

## Response to Letter 98a, Noel Mills

1. See responses to Letter 2b.



**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding **your** Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - *Updating required school area warning signage*
  - *Consider posted speed reductions down to 15 MPH in school areas*
  - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
  - *Exploring additional stop sign controls at intersection*
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.

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**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
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**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Noel Mills

DATE: 9/25/22

CONTACT INFORMATION: 831-917-9373

## Response to Letter 98b, Noel Mills

1. See responses to Letter 2c.



**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding your Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - Updating required school area warning signage
  - Consider posted speed reductions down to 15 MPH in school areas
  - Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps
  - Exploring additional stop sign controls at intersection
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.



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**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

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Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Jason & Rafael Mendez

DATE: 10/3/22

CONTACT INFORMATION: 831-333-6089

## Response to Letter 99, Allison & Rafael Mendez

1. See responses to Letter 2c.

From: **Amos Nachoum** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>

Date: Tue, Oct 4, 2022 at 4:16 PM

Subject: Public Comment on RDEIR for CHS Stadium

Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

-----

#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

-----

#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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con't.

on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

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iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc



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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
  - ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
  - iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.
- a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Amos Nachoum

[amos@biganimals.com](mailto:amos@biganimals.com)

25398 flanders drive

Carmel , California 93923

## Response to Letter 100, Amos Nachoum

1. See responses to Letter 2b.

From: **Hilmar Ockens** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)> Date:  
Tue, Oct 4, 2022 at 8:54 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

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con't.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

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B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

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i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
  - ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
  - iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.
- a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

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C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Hilmar Ockens

[hilmarkarlockens@yahoo.com](mailto:hilmarkarlockens@yahoo.com)

Vizcaino 10,SE of mtn view

Carmel by the sea, California 93921

## Response to Letter 101, Hilmar Ockens

1. See responses to Letter 2b.



From: **Suzanne Ockens** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 8:59 PM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

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C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

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Suzanne Ockens

[hilmarkarlockens@yahoo.com](mailto:hilmarkarlockens@yahoo.com)

Vizcaino 10, SE of mtn view

Carmel by the sea, California 93921

## Response to Letter 102, Suzanne Ockens

1. See responses to Letter 2b.

From: <[Kevin.Pahler@lamresearch.com](mailto:Kevin.Pahler@lamresearch.com)>

Date: Tue, Oct 4, 2022 at 8:41 PM

Subject: Lights at CHS

To: <[dpaul@carmelunified.org](mailto:dpaul@carmelunified.org)>

1 Hi Dan, I am emailing you about the stadium lights that are being proposed. This is the view and picture of the current lights of the pool. As you can see this highly impacts my enjoyment of the views that this area provides. You and your team need to come up with alternative plans. This project impacts the environment, the charm, and home values of this great area. Appreciate your understanding and consideration to establish alternative plans.

Thanks, Kevin Pahler

3600 Edgefield Place



## Response to Letter 103a, Kevin Pahler

1. The commenter raises their concerns with visual impacts and their enjoyment of views of the area as a result of existing pool lighting and the proposed project more generally. The commenter also provides a photo of the existing pool lights as seen when turned on at night from a neighborhood to the north of campus.

As discussed in Section 5.0, Aesthetics, of the RDEIR, under “Public Views and Sensitive Receptors” (page 5-3), viewer sensitivity characterizes the reaction of a viewer to landscape change in the project area. For purposes of the RDEIR analysis, viewer groups include residents in public areas of neighborhoods adjacent to the project site. Views from private properties are important to their residents; however, CEQA’s purview for determination of a significant effect on the environment applies to public views. Please also refer to responses to Letter 20, comment 1, and Letter 14-1-c. The CEQA Guidelines Appendix G checklist regarding “Aesthetics” (under checklist question “c”) questions whether a project would: “In nonurbanized 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 point).” Therefore, the visual analysis contained in the RDEIR and as presented in the visual simulations included with the RDEIR, reflect only those views from publicly-accessible viewpoints. Impacts from publicly accessible viewpoints were determined to be significant and unavoidable. One could also draw the conclusion that impacts from private residences would be the same.

Regarding project impacts to neighborhood “charm” and home values, this is not an environmental issue and therefore, no response is necessary. (See CEQA Guidelines, §§15131(a) & 15358(b); *Preserve Poway v. City of Poway* (2016) 245 Cal. App. 4th, 560.) Please also see response to Letter 19a. Moreover, the commenter does not provide any substantiating evidence that the project may have economic and social impacts. No changes to the RDEIR are required.

From: **Kevin Pahler** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 8:14 AM  
Subject: Public Comment on RDEIR for CHS Stadium  
Lights To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

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The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

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i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Kevin Pahler

[kevin.pahler@lamresearch.com](mailto:kevin.pahler@lamresearch.com)

3600 Edgefield Place

Carmel, California 93923

## Response to Letter 103b, Kevin Pahler

1. See responses to Letter 2b.



Date: October 4, 2022

To: Dan Paul, Chief Operations Officer

cc: [feedback@carmelunified.org](mailto:feedback@carmelunified.org)

[getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org)

1 Thank you for the opportunity to comment on the Carmel High School Stadium Improvements Revised Draft Environmental Impact Report (RDEIR). In reading this report it seems lacking in some major environmental areas and feels as though it was written with some bias, such as calling the neighbors 'very sensitive receptors' and 'visually sensitive receptors,' as well as the use of the word 'minimal' to purposefully be vague in order to change the subject and discard concern.

Well, there is a great deal of concern and I appreciate the opportunity to share mine...

2 As a resident that lives 2 blocks from Carmel High School with a family made up of multiple CHS alum (1978, 1980, 1986, 1988, 2004, and 2018), I find the push by this administration for the stadium lights to be out of character for Carmel Unified and lacking in its understanding of the local culture, not to mention its own history of environmental consciousness and efforts (i.e. Ocean Guardian School). Carmel is special for a reason... The locals have worked to keep it this way. There is a reason our home prices are what they are and our marine sanctuary is what it is... This is Carmel. Saturday games have always been a Carmel High tradition, and why not? Have you seen the view?

3 As a resident, I am also highly concerned with the safety implications that this brings to our local neighborhoods. Please find enclosed two news reports of local Friday Night Lights incidents that took place on September 23rd in neighboring towns. When I attended the first board meeting on the topic of the lights and the concern about safety was expressed, a gentleman representing Carmel High School addressed the issue by suggesting that additional law enforcement be brought in. Really? How about not bringing the element into town at all?!

4 While I appreciate the additional parking mitigation that the district offered for the Shoe Game and the Homecoming Game, which was very lightly attended, I question if this is the plan for every game from here forward. If these events are taking place at night, I don't believe that getting a couple of extra staff from the Maintenance and Operations department will be adequate security.

5 I do have to question if an administration that is largely from out of the area has the best interest of Carmel and its residents (which include all of your students and families) in mind. And while I appreciate all of the hard work and efforts by our current board, and know there are some very environmentally responsible individual (s), it is also common knowledge that there is bias within this board on this topic. I don't say this to place blame, but it is concerning.

Thank you for taking the time to read this and please know that it is not written or submitted lightly (pun intended) but is composed of deep thought.

Best Regards,  
S. Sosna

# Violence breaks out at 2 Central Coast high school football games

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KSBW ACTION NEWS 8

Updated: 7:13 PM PDT Sep 26, 2022

Infinite Scroll Enabled



Felix Cortez [f](#) [t](#) [✉](#)  
Reporter



## **SALINAS, Calif. —**

Friday Night Lights on the Central Coast turned violent following two football games in Monterey and San Benito counties in which fights and gunfire erupted.

In Monterey County four people were shot following the Condor game at North Monterey County High School.

Sheriff's deputies said two juveniles showed up at the game and challenged another male before they were kicked out.

Investigators said the two juveniles then followed the victim as he drove home with three friends and then fired several shots at their car. No one was seriously injured but no arrests have been made in the shooting.

Around the same time that incident was happening, deputies in San Benito County were arresting four people at the Hollister game following a couple of fights and a knife being brandished.

“That's sad, that's really, really sad,” said Rae Jameson of Hollister.

That incident started when a fight broke out near the snack bar. That's where one teen was injured when he was cut by a knife but deputies are not sure if he accidentally cut himself. While deputies are investigating that fight three juveniles challenged them to a fight and they were immediately arrested. After that, a fight broke out outside the gates. And then following that a deputy is threatened with his life.

“An adult male walked up to the commander and said I know who you are and I'll kill you and your family and so he was taken into custody for those threats,” said San Benito county sheriff Eric Taylor.

“It is getting out of hand. It's way too much, it's just not here it's everywhere now and something's gotta be done,” added Jameson.

Sheriff Taylor said that type of behavior won't be tolerated so he's working with school leaders to beef up security that could include a clear bag policy, metal detectors and probation officers to help at the gates.

“To make sure that we have a proactive approach outside the gates that we can see if there's any trouble brewing before it even comes into the game so that we can stop it at the gate and not let it into the facility,” said Taylor.

At least some Hollister high school students think game security could be increased.

“Like bag checks or like the scanner thing the body scanners. I think that would make it more safe to know if people have stuff on them,” said Hollister sophomore Alexis Garrett.

“Yea maybe just more security, pat downs making sure that no none does nothing with anything in there probable help,” said Garrett’s classmate Dylan Huerta.

High school and district leaders said they were saddened by Friday’s violence but assure the school community they are working with law enforcement for the best tactics moving forward.

They confirmed some of those involved in the criminal activity are students and will be dealt with according to district policy.

## Teen shot while leaving North Monterey County High football game

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**KSBW 8**  
ACTION NEWS

Updated: 1:19 PM PDT Sep 26, 2022

Infinite Scroll Enabled

 **Josh Copitch**    
Digital Media Manager



**CASTROVILLE, Calif. —**

The Monterey County Sheriff's Office is investigating a non-deadly shooting that took place near a high school football game.

According to the sheriff's office, two juveniles made threats to another teen at the North Monterey County High School. The two people making threats were ejected from the property by high school employees.

Afterward, the same two people shot at the teen they had confronted at the game as he was leaving in his car.

The victim refused medical treatment and later reported one round grazed his arm.

## Response to Letter 104, S. Sosna

1. The commenter expresses their concerns with the RDEIR lacking in “some major environmental areas” but does not specifically cite what environmental issues or topics. The commenter also questions residents being identified as “sensitive receptors” or “visually sensitive receptors.” That designation is used only in reference to visual sensitivity of residents as pertains to the visual analysis contained in Section 5.0, Aesthetics, of the RDEIR (see discussion of “Sensitive Receptors (Nighttime)” on page 5-5 of the RDEIR).
2. Comment noted. No environmental issues are raised. Therefore, no response is necessary.
3. This comment is regarding safety implications that the proposed project would bring to local neighborhoods. The commenter cites and attaches a local news article about incidents at high school football games in North Monterey County and San Benito County. However, no evidence is provided that the project would result in safety issues resulting in an adverse environmental impact. Please also refer to response to Letter 14-4-d. Therefore, no response is necessary.
4. The commenter questions the feasibility of additional parking mitigation. Mitigation Measure 11-4 in Section 11.0, Transportation, requires preparation and implementation of a Traffic Management Plan during highly-attended events at the campus. In summary, the plan requires providing off-campus parking at Carmel Middle School and providing shuttles to and from the games, as well as encouraging modes of transportation other than automobiles, on-site traffic management and supervision, and off-site parking management. Implementation of the plan would ensure sufficient parking during high-attendance events and help ensure better overall attendee safety. Refer to Section 11.0, Transportation and Parking, of the RDEIR for further discussion.
5. No environmental issues are raised. Therefore, no response is necessary.



From: **Martin Schwartz** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 7:11 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

-----

## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments

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(Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Martin Schwartz

[martmdcm@comcast.net](mailto:martmdcm@comcast.net)

Lincoln 2SW of 12th

Carmel by the Sea, California 93921



## Response to Letter 105, Martin Schwartz

1. See response to Letter 2b.

From: **Yu-Chu Shen** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 5:34 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I am extremely concerned with the current plan. Besides the points below, I also want to highlight some of the things up front. Obliterating the tennis court to make room for parking sends the wrong signal to tennis athlete that their sport is not valued. Not to mention the plan still does not have enough spaces for parking, which means folks WILL park in the residential neighborhood. If CUSD members have lived in the neighborhood, they would know how terrible traffic becomes when there is football game as is. The site simply does not have enough space for holding such events that CUSD have in mind. The site is too close to residential area that the light and noise pollution impact is gonna be unacceptable.

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I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any

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explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

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C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

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- i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>
- ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

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E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into



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"Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

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Yu-Chu Shen

[yusboston@gmail.com](mailto:yusboston@gmail.com)

26145 S Carmel Hills Dr

Carmel, California 93923

## Response to Letter 106, Yu-Chu Shen

1. The commenter addresses their concerns with removing the existing tennis courts at the high school and the lack of on-campus parking more generally at the high school. The tennis courts are proposed to be replaced with additional on-campus parking, in response to the neighbors' concern about students parking in the neighborhoods and comments received on the original DEIR. With implementation of the proposed project, tennis practice would be held at the existing Carmel Middle School tennis courts. Tournaments would continue to be held off-site at Carmel Valley Athletic Club and Mission Ranch. See Table 3-4 of the RDEIR and related discussion. The proposed project includes 111 new parking spaces, which is discussed in Section 4.0, Project Description, as well as in Section 11.0, Transportation and Parking, of the RDEIR.

The commenter also notes their concerns about noise and light pollution impacts a result of the proposed project. Noise impacts are addressed in Section 10.0, Noise, of the RDEIR. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR.

No changes to the RDEIR are required.

2. See responses to Letter 2b.

From: **Rita Shugart** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 8:11 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
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Rita Shugart

[rkshugart@gmail.com](mailto:rkshugart@gmail.com)

98 Via Cimmaron

Monterey, California 93940

## Response to Letter 107, Rita Shugart

1. See responses to Letter 2b.

From: **Caesar Simon** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 7:20 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the

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scenic vistas and visual character of Carmel:

- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

- i. Lights recommendations for Wellesley HS:

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A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

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B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely



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expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

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E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not

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perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

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Caesar Simon

[csimon928@gmail.com](mailto:csimon928@gmail.com)

24429 S San Luis Ave

Carmel, California 93923

## Response to Letter 108, Caesar Simon

1. See responses to Letter 2b.

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Date: Tue, Oct 4, 2022 at 10:41 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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Christopher Smith

[chris-smith\\_831@yahoo.com](mailto:chris-smith_831@yahoo.com)

25595, Row Place

Carmel, California 93923

## Response to Letter 109, Christopher Smith

1. See responses to Letter 2b.

From: **Freya Smith** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 3:53 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

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scenic vistas and visual character of Carmel:

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

- i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

- ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County’s noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely

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expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not

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perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwitAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmljXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Freya Smith

[snowlove0505@yahoo.com](mailto:snowlove0505@yahoo.com)

25595 Row Pl

Carmel, California 93923

## Response to Letter 110a, Freya Smith

1. See responses to Letter 2b.



**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

I We have serious concerns regarding your Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!

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**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - *Updating required school area warning signage*
  - *Consider posted speed reductions down to 15 MPH in school areas*
  - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
  - *Exploring additional stop sign controls at intersection*
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.



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**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Freya Smith

DATE: 10/11/22

CONTACT INFORMATION: 831.521.2053

## Response to Letter 110b, Freya Smith

1. See responses to Letter 2c.

From: <[swen@gbis.com](mailto:swen@gbis.com)>  
Date: Tue, Oct 4, 2022 at 1:12 PM  
Subject: Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 | Please do what is best for the Students.

**John Swendseid**

24712 Dolores St.

Carmel, CA 93923

Ph. 831-624-2722

Cell: 702-498-3686

## Response to Letter 111, John Swendseid

1. No environmental issues are raised. Therefore, no response is necessary.



From: **Pamela Swenson** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 7:19 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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expected noise levels for games (discussed in item 3A).

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- ii. Noise shielding, such as Acoustiblok fencing
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The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

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Pamela Swenson

[pamswenson@gmail.com](mailto:pamswenson@gmail.com)

25455 Shafter Way

Carmel, California 93923



## Response to Letter 112a, Pamela Swenson

1. See responses to Letter 2b.

Dear Superintendent Ted Knight,

We have serious concerns regarding your Environmental Impact Report. You are required to respond.

- 1 **Show us the full impact of the light pollution on our treasured views and night skies.**
  - Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth!
  - Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- 2 **Stop surprises, the RDEIR includes significant NEW expanded construction projects.**
  - Re-start community engagement with a legally required Scoping Session.
  - The 18-foot roadway, new parking lots and viewing platform don't provide enough details.
- 3 **Inspire our future with long-term solutions versus short-term band-aids. Properly assess CMS potential.**
  - CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
  - CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
- 4 **Prioritize implementing "Late Start", a CA State Law benefiting ALL students.**
  - Address the root cause of the delay and purchase more buses and hiring more drivers.
  - Other school districts like MPUSD have adopted the law with no lights - we should be able to as well.
- 5 **Fix the light pollution emitting from the pool lights you installed without a legal process.**
  - Install LED filters and use the lights as little as possible. Keep your promise from December 2021.

P.S. To School Board Members: Sara Hinds, Karl Pallastrini, Tess Arthur, Anne Marie Rosen, Seaberry Nachbar  
• Help shut down this plan due to pollution, safety and the impact on our community.

NAME: *PAMELA SWENSON*  
DATE: *10-1-2022*  
CONTACT INFORMATION:  
*pamswenson@gmail.com*

## Response to Letter 112b, Pamela Swenson

1. See response to comment 1 to Letter 2c.
2. See response to comment 3 to Letter 2c, comment 16 to Letter 11b, comment 1 to Letter 14-1-u, comment 1 to Letter 14-4-a, and comment 2 to Letter 14-2-c.
3. See response to comment 4 to Letter 2c.
4. See response to comment 10 to Letter 2c.
5. See response to comment 15 to Letter 2c.

From: **Nancy Tuma** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 5:16 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

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B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

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I want to add that I believe the proposed new lighting will benefit very few people and disadvantage many of us. (I do not believe that attendance at games will significantly increase as a result of the proposed new lighting.) Games can usually be played in the afternoon or in the daytime on weekends.

Nancy Tuma

[n\\_tuma@aol.com](mailto:n_tuma@aol.com)

25369 Carmel Knolls Dr

Carmel, California 93923

## Response to Letter 113, Nancy Tuma

1. See responses to Letter 2b.

From: **Charlie Wahle** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Tue, Oct 4, 2022 at 8:42 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

- i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

- ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely

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expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not

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perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwitAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmljXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Charlie Wahle

[charliewahle@gmail.com](mailto:charliewahle@gmail.com)

Carmel, California 93923

## Response to Letter 114a, Charlie Wahle

1. See responses to Letter 2b.

From: **Charlie Wahle** <[charliewahle@gmail.com](mailto:charliewahle@gmail.com)>  
Date: Mon, Oct 10, 2022 at 10:22 AM  
Subject: Resending final version of my RDEIR comments (#1)  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Hi

It seems that I sent the wrong version of my Visual Impacts comments. Please replace it with this one, labeled "final".

Thanks very much,  
Charlie

Charles M. Wahle, Ph.D.  
Carmel, CA  
831.238.6266



**Public Comment on CUSD's Revised DEIR for Proposed CHS Improvements**  
**Charles M. Wahle, Ph.D.**  
**Carmel, CA**  
**Oct. 10, 2022**

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**TOPIC #1:**  
**VISUAL IMPACTS AND AESTHETICS**

**IMPORTANT NOTE**

These Public Comments are based on my assessment of the 2022 RDEIR. They are unique and are not duplicates of potentially similar comments submitted by other concerned residents of Carmel. Therefore, they should be evaluated and responded to independently in the Final EIR.

**OVERVIEW OF COMMENTS**

Public concern is growing rapidly over CUSD's proposed 80' Stadium Lights at CHS. Those worries are not solely driven by the lights' spilling over onto nearby residences and natural areas. Of equal concern to the wider Carmel, Pebble Beach and Carmel Valley community is the resulting harm to the community's enjoyment of treasured, pristine coastal and valley views and naturally starry night skies.



Glaring at maximum brightness most evenings and many nights throughout the school year, these new stadium lights will forever diminish iconic and economically important views from neighborhoods and public spaces looking West and Southwest toward Point Lobos, Carmel Highlands and Carmel Bay, and looking East and North from the mouth of Carmel Valley, Point Lobos, Carmel and Scenic Highway Corridor SR 1.

The public's fundamental concern about this project remains unanswered: *is safeguarding our shared natural heritage and coastal and valley views for future generations more important than Friday Night Football and longer evening sports practices?* CUSD's Board of Trustees must vote on that question in late November based on the information in the Final EIR. Therefore, that report needs to *meaningfully* examine rigorous, relevant data on how the proposed lights will impact our shared environment, and how they will diminish the enjoyment, solace and benefits it gives to so many residents and visitors of the Carmel area. To date, it does not.

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The comments below address serious problems in the Revised Draft Environmental Impact Report's (RDEIR) assessment of *Visual Impacts from the CHS Stadium Lights*. The District's initial Draft EIR was deeply flawed and, as a result, was substantially revised in response to strong public concern over its treatment of many issues, especially light pollution. Sadly, and surprisingly, the new Revised DEIR provides an equally incomplete and skewed window into this profoundly important and defining question.

We – the public and CUSD's Trustees – deserve better information than what the RDEIR presents. Currently, its many gaps make it impossible for any reader, including CUSD's elected Board of Trustees, to fairly and objectively assess the impacts of the CHS Stadium Lights on important viewsheds and night skies near CHS and throughout the greater Carmel region. Left uncorrected in the Final EIR, CUSD's Trustees will not have the required information needed for an informed and defensible decision on the proposed CHS Stadium Lights in late November 2022. These avoidable problems need to be fixed now. My comments below identify important gaps in the RDEIR, and provide questions and solutions intended to strengthen the validity and value of the District's Final EIR.

## **CRITICAL PROBLEMS IN THE REVISED DEIR AND NEEDED FIXES FOR FINAL EIR**

2

### **1) LIGHT GLARE AND TRESPASS: REAL OR MODELED DATA?**

#### **Problems in the RDEIR**

The potential for glare and trespass from the proposed CHS Stadium lights into nearby neighborhoods lies at the heart of many public concerns about this project. The RDEIR's Project Description (Section 4) presents a series of graphics purporting to show "measurements" of those future light levels at various locations around the CHS football field (Figures 4.2 a,b,c). Unfortunately, the report does not specify how those "measurements" were obtained. Specifically, it does not clearly state (Appendix C) whether these were:

- a. actually recorded empirically (i.e. measured) at the CHS field using light produced by a temporary lighting system that mimics the one proposed for CHS;
- b. extrapolated from real measured light values at a different stadium; or,
- c. mathematically modeled for the CHS stadium using Musco's engineering software

The source and credibility of these critical light values is fundamental to the public's understanding of their significance as they apply to the CHS stadium proposal. So too is public trust that the report is presenting factual information in a transparent and honest manner.

#### **Questions and Fixes in the FEIR**

- A. How were these light values generated? Are they. In fact, real "measurements", extrapolated data from elsewhere, or modeled predictions? "Measurement", as used repeatedly in the RDEIR, means quantifying something tangible in the real world. Predictions are a very different kind of information requiring different types of explanation, assumptions, and validation, especially if they are the foundation of the decision whether to install these lights.

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- B. If these light values were simply extrapolated from a similar lighted field, CUSD must provide documentation that enables the public to gauge whether the comparison is fair.
- C. If the values were generated by a computer model predicting expected outputs from comparable lights, that fact must be explained in Section 4 and in Section 5.
- D. Does CUSD’s environmental consultant really know the meaning of the term “measurement” or was this usage intended to obscure the origin of these data?
- E. Were these or similar predicted values used to create the Visual Simulations?
- F. If these data are, in fact, actual measurements recorded during a field test of the proposed light systems at CHS, then:
  - a. they must be described and labeled as such wherever relevant in the RDEIR.
  - b. CUSD must explain how and when this secret field test was performed, and why the public was not given the opportunity to observe. This regrettable situation would be particularly egregious given the District’s continuing, frustrating refusal to provide story poles or other ways for the public to realistically envision the real impacts of the proposed lights at CHS – before they are installed.

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## 2. WHO WILL SEE THE CHS LIGHTS? REAL GEOGRAPHIC SCALE OF VISUAL IMPACTS

### Problems in the RDEIR

This question – who will see the lights, and how will that glare diminish their experience of our largely pristine natural environment? – is central to understanding the impacts of CUSD’s proposed Friday Night Lights. Without more rigorous and transparent data, *no one*, including CUSD’s Board of Trustees, can fairly and objectively evaluate the relative merits of this project.

CUSD’s first Draft EIR completely failed to adequately address this fundamental issue. In response, several concerned residents submitted as a public comment, a *Viewshed Analysis of “Who Will See the Light?”* (see SaveCarmel.org). Using Google Earth Pro’s publicly accessible Viewshed Tool, that straightforward analysis calculated lines-of-sight between two known locations, such as a person on a road or residence and the CHS lights

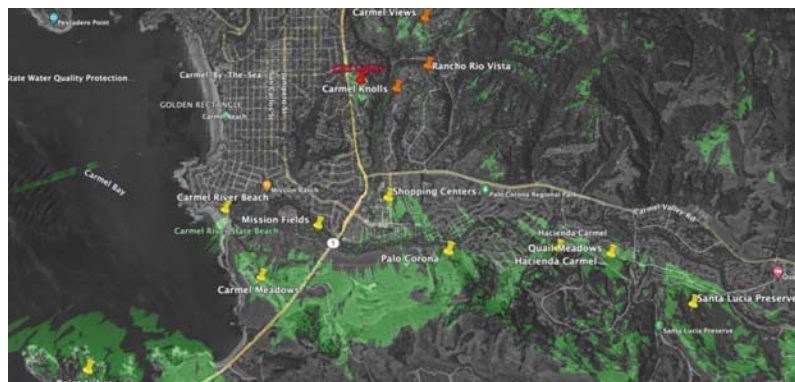
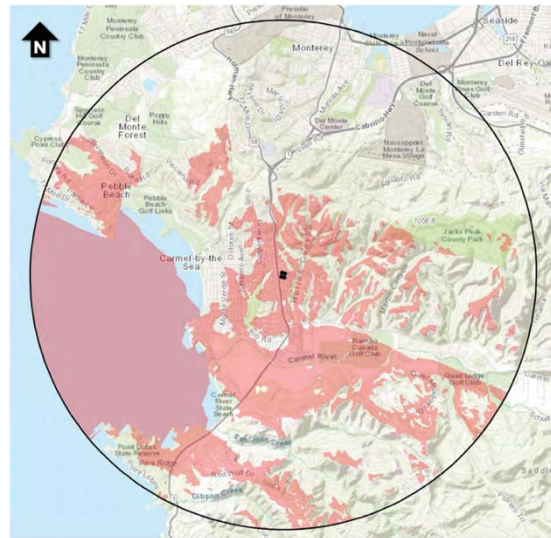


Fig. 1. Map from concerned residents’ Viewshed Analysis showing, in Green highlights, areas where the proposed CHS lights may be visible. Submitted in 2021 as public comment on the DEIR.

Its striking results revealed a surprisingly broad swath of locations and “sensitive receptors” (aka - people) that will likely see the CHS Stadium Lights from their vantage points of homes, streets, businesses, schools, parks, etc. These impacted areas, and the people who live, work, learn, and recreate in them, reach far beyond the CHS campus into Jacks Peak, Carmel Highlands, and Carmel Valley. For many residents and visitors, the proposed CHS Stadium Lights – both the glaring lights and their unlit 80’ poles -- will permanently impair be their line-of-sight to cherished features of our shared coastal and valley viewshed.

Fig. 2. Map (5.2) from CUSD’s RDEIR showing areas in Red (land) or Purple (ocean) that may “see” the CHS lights within a 3.5-mile radius of campus. Note the newly predicted impacts West of CHS (black dot).

In response to these criticisms, the District’s new RDEIR contains a similar and more complex spatial analysis showing locations in the region that “may see” the CHS Stadium Lights by virtue of their line-of-sight with the campus (black dots) (Fig. 2 here, and Fig. 5-2 in RDEIR).



Importantly, while showing a similar pattern of where the lights can be seen, CUSD’s new, sophisticated spatial analysis revealed *even wider visual impacts throughout the Carmel area. Impacted areas now include Carmel by the Sea, Pebble Beach, and Carmel Bay.*

Curiously, although the RDEIR also states that the lights will be visible far beyond their report’s very limited, 3.5-mile analysis area, CUSD provides no visualization, rationale or discussion of those results.

The similarities and disparities between these two analyses are important and raise concerning questions about the treatment of this critical issue in the RDEIR. Listed below are some key questions and steps CUSD must address to ensure that the Final EIR adequately addresses this problem in ways that are valid and transparent to the reader, and that enable an informed and defensible decision by its Board of Education Trustees.

**Questions and Fixes for the Final EIR**

- A. Why was the RDEIR’s study area arbitrarily limited (i.e. clipped in GIS) to a 3.5-mile radius around CHS? What underlying assumptions were used to justify this approach?
- B. Why did the RDEIR state that the lights will be visible further out into Carmel Valley (as we found in our earlier viewshed analysis), but then explicitly elected not to display them on its map or to discuss them in its results? Do these areas, and the people who live, work, and recreate in them, not count in CUSD’s calculus of this project? These results must be presented and assessed in the FEIR.
- C. Why did the RDEIR fail to discuss *CUSD’s surprising new finding* that the CHS lights may be visible further West into Carmel by the Sea, in Pebble Beach, and in the California

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Coastal Zone? Clearly, finding that the lights may impact these important places is worthy of mentioning in this consequential analysis.

- D. Why does the RDEIR fail to discuss the implications of these results for all residents, businesses, hotels, and public spaces used by residents and visitors alike beyond its 3.5-mile circle? Is it CUSD's intention to ignore and marginalize residents of such a large part of its constituency and economy?
- E. To properly address this issue in the FEIR, CUSD must:
- a. Redo the RDEIR's spatial analysis of *who will see the lights* to include a larger surrounding area of potential impacts that extends at least to a 10-mile radius around CHS. Clearly, the lights, as seen from any vantage point, may seem less problematic in some locations father away, but people cannot make that determination, nor can CUSD, until they know who will see the lights *and* what they will look like. The current 3.5-mile boundary is simply insufficient for the purpose.
  - b. Quantify (i.e. count/enumerate/list using available GIS database resources) the *actual number* of public and private places from which the CHS lights may be seen when they are being used every evening of the school year, including:
    - i. Hotels
    - ii. Restaurants
    - iii. Businesses and public offices
    - iv. Protected natural areas (e.g. local, county, regional, state and federal parks, sanctuaries, refuges, reserves, conservation areas, etc.)
    - v. Other recreational and spiritual facilities open to the public
    - vi. Medical and senior care facilities
    - vii. Residences
  - c. Accurately and meaningfully present those results in maps and text in the FEIR.
  - d. Fully discuss the implications of these results for understanding the balance between the project's potential benefits vs its risks to our environment and the people of the area who value it.

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### **3) WHAT WILL WE SEE? CUSD's VISUAL SIMULATIONS OF THE LIGHTS**

#### **Problems in the RDEIR**

The RDEIR was substantially revised in response to concerned citizen's demands for an objective and meaningful analysis of how the lights will appear to viewers throughout the area. That question has two distinct components:

- How will the lights and poles themselves look to viewers in various locations?
- How will the lights' physical presence and/or glare interfere with or impair that viewer's ability to see the important viewshed features in the background?



The Revised DEIR now presents a technically complex visual simulation of the lights that could, but does not yet fully, answer those questions. To that end, CUSD's consultant created a digital GIS-based landscape of the area. Photographs of selected landscape views near CHS were taken from a limited number (10) of nearby public vantage points (i.e. Key Observation Points, or KOPs). Those 10 images were then incorporated into the digital 'landscape', along with 10 location-specific predicted values for perceived light intensities for the same KOPs. Together, this information was used to simulate photo-like images of how the proposed CHS stadium lights may appear as seen from those 10 KOPs in daytime and nighttime.

Clearly, the validity (as verifiable by someone not familiar with the underlying analytical process) of CUSD's visual simulation in the RDEIR depends heavily on two characteristics:

- the quality of those initial landscape photographs shot from the 10 KOPs; and
- the relevance of those 10 specific vantage points (i.e. Key Observation Points) to the assessment of the lights' predicted impacts.

Unfortunately, both seem seriously, and avoidably, flawed in the current RDEIR.

#### **Questions and Fixes for the Final EIR**

- A. Quality of Landscape Photos - Many of the 10 current images, upon which the simulations of viewshed impacts are based, are flawed and, therefore, largely unfit for this analytical purpose. Many are taken at odd angles, are blurry, or were taken during weather conditions, like foggy or overcast skies, that obscure important landscape features in the viewshed, including hills, peninsulas, and coastal waters. These places are what makes Carmel's views special. Why were they used in this analysis when even a casual glance reveals their deficiencies? Given the critical role these photos play in CUSD's visual simulations, their uneven image quality prevents accurate assessments of the lights' viewshed impacts. They must be retaken on a day with good weather allowing the full landscape behind them to be seen clearly in the simulation.
- B. Vantage Points for Landscape Photos – The assessment of CUSD's proposed stadium lights hinges in large part on what will people see from various vantage points. CUSD's seemingly arbitrary selection of 10 Key Observation Points does not realistically represent the diversity of important vantage points, nor does it enable an objective assessment of the lights' visual impacts on the community.
  - a. How were the 10 KOPs selected in the DEIR and RDEIR, and why are there none from locations further away, particularly out into Carmel Valley?
  - b. Why were the KOPs exclusively limited to *publicly accessible areas* like roads and parking lots? None represent the views from any of the many residences affected by the lights. Does CEQA's impact analysis apply only to visual impacts in public spaces? Does CEQA explicitly preclude additional analyses of impacts occurring on other meaningful parts of the community, including private land or residences? Or did CUSD simply decide not to complicate the assessment of impacts by including their residents' views?



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- c. Even if CEQA’s scope is, in fact, strictly circumscribed to public spaces, why shouldn’t CUSD broaden the scope of *its own assessment* of the real-life impacts of its actions on its constituents. Is a resident’s ability to see and enjoy a treasured view from their home is really not going to be considered in our School District’s evaluation of their proposed project? If so, the Final EIR needs to state that right up front and explain its legal basis in CEQA and its implementing regulations, guidance, and case law.
- C. Regardless of CEQA’s purported limits, to be credible and relevant to the whole Carmel community, CUSD’s visual simulation analysis needs to be repeated with better photos (see 3A) taken from a wider range of meaningful vantage points where the views – both to and from those sites - actually matter (e.g. Point Lobos, Ranch Rio Vista, Carmel Views, Carmel Knolls, Jacks Peak, Fish Ranch, The Preserve, Quail Lodge, Del Mesa, Carmel One (aka September Ranch). More meaningful vantage points must be included in this analysis, whether or not they are on public or private land.
- D. This important question – what will we see – could have been answered simply, cheaply, and transparently long ago had CUSD agreed to erect temporary story poles, balloons, or other devices that would give residents a sense for how the lights will look from various vantage points. It is not too late to do this, especially in light of the questionable utility of the RDEIR’s visual simulations. Why the continued refusal to do such a simple test?

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#### 4) WHAT VITAL CARMEL VIEWS ARE AT RISK?

Clearly, some views are more highly prized than others. This region is known and marketed worldwide for its spectacular and largely unsullied coastal, valley and mountain viewsheds. Our local economy is driven by people’s desire to live in and experience those still-pristine features of the physical environment. Understanding how CUSD’s proposed Friday Night Lights will impact that vital, and profoundly important, shared natural resource (our views) includes:

- where important coastal and valley views (e.g. Point Lobos) can be seen from various vantage points (public and private)
- how CHS’ 80’ stadium lights will affect those views; and,
- how much the community values our unmarred views that so many have worked so long to protect

Presently, CUSD’s RDEIR fails to provide the necessary data or even acknowledge this problem. It has arbitrarily, and perhaps cynically, limited the geographic scale and impacts of its analysis in ways that suggest that although the light’s visual impacts will be “Significant and Unavoidable”, they really aren’t much of a problem for the wider public. As a result, neither CUSD, the public, nor its Trustees currently have the objective information upon which to make that assessment, despite many previous public requests and suggestions. That crucial gap still exists in the RDEIR. It must be filled in a strengthened Final EIR before the Trustees vote on this project.

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### **Questions and Fixes for the Final EIR**

- A. Why does CUSD repeatedly refuse to discuss in any meaningful way the proposed lights' impacts on:
  - a. important coastal and valley views around Carmel? These viewsheds are vital to our local economy and to our community's legacy for future generations.
  - b. viewshed and areas designated as "sensitive" or "special" by a variety local, county, or federal authorities
  - c. the ancestral and sacred lands of native American peoples who have lived here for millennia and have a formal voice in environmental matters
- B. In the Final EIR, CUSD must use new spatial analysis and better visual simulations to identify critical viewshed areas, including from public spaces and residences, whose valued views of land and sea beyond CHS will be impaired by the stadium lights' bright glare nearly every evening of the school year.
- C. The FEIR must also document and illustrate on maps local and regional areas that have already been officially designated as being "environmentally sensitive" or equivalent status by governmental land use plans, state statutes and conservation programs, and protected areas designations at the local, county, state and federal levels (e.g. CA Scenic Highway Corridors).
- 6 D. The RDEIR mentions, but effectively marginalizes, the interests, rights and roles of native American tribes who have inhabited this region for millennia. Their cultures are historically interwoven with the landscape and viewsheds in ways that existing zoning ordinances and CEQA checklists cannot adequately reflect. This is not the 1800's, and CUSD's - our community's - Final EIR must reflect those native people's perspectives on the project's impacts to their ancestral viewsheds based on meaningful, personal engagement with tribal representatives. Sending a few formal letters does not constitute real consultation in today's world.
- E. Finally, the above information must be synthesized and incorporated into the FEIR in a meaningful way that actually helps, as opposed to impedes, readers' understanding of the issues and challenges created by CUSD's proposed lights and how that relates to the preservation or diminution of our shared natural heritage.

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### **5) SKY GLOW, SUNSETS, AND STARRY NIGHTS**

#### **Problems in the RDEIR**

The RDEIR benignly defines "Sky Glow" as: "*the diffuse brightening of the night sky*". Here is what that sky glow looks like from Carmel Views when the existing CHS pool lights are on. The first image below (Fig. 3) illustrates how high and wide the "sky glow" from the pool lights can reach, even on a relatively clear night.



Fig. 3. Sky Glow as seen looking westward toward CHS, including pool and campus lights.

The second image (Fig. 4, below) shows a similar scene that also reveals how that “sky glow” can obliterate the late evening sunset, just at the moment when its colors are the most vibrant. Clearly, CHS’ glaring stadium lights and the sky glow they will create will also prevent anyone seeing the normally starry skies above.



Fig. 4. Sky Glow and impaired sunset on a hazier night, showing pool lights looking westward toward CHS.

The RDEIR does address sky glow and its likely impacts on the sky, both as an independent light source, and as a contributor to the area’s significant cumulative impacts. What it does not acknowledge clearly, however, is how often Carmel’s evening sunsets and starry nights may look like this. CUSD plans to use the CHS stadium lights at full power for practices (until 8:30pm) every school day, and for games (until 10pm) on many nights. Although common in big cities and Texas towns with Friday Night Lights, these sky domes are not “natural” occurrences here; and yet they are about to become the “new normal” if CUSD installs its

stadium lights. Carmel’s evening skies, sunsets and starry nights our community treasures, may soon be transformed into this unnaturally glowing, milky haze after the CHS lights are installed.

**Questions and Fixes for the Final EIR**

- A. Why did CUSD not include better photos of how their “sky glow” already affects the community’s evening views and night skies?
- B. Why did CUSD not analyze and predict how often the local weather conditions (e.g. fog and marine layer) will create “sky glow”?
- C. To address these gaps in an important and poorly-understood issue, CUSD’s Final EIR must:
  - a. Present understandable data, images, and summaries explaining how often sky glow may be present in our evening and night skies;
  - b. Relate that information to seasonal weather patterns and when the lighted stadium is expected to be used;
  - c. Fully explore how the anticipated lighting does, or does not, meet the standards of the International Dark Sky Association certification when sky glow is taken into account; and,
  - d. Fully describe sky glow’s impacts on visual resources (e.g. evening sunsets, starry nights) of real value to the people and visitors in the Carmel area.

**6) THE FINAL BALANCING ACT: CAN CUSD WEIGH THE BENEFITS AGAINST THE RISKS?**

**Problems in the RDEIR**

CUSD’s Board of Trustees will soon vote on whether to install 80’ football stadium lights at Carmel High School. Burning bright nearly every evening and many nights of the school year, the glare from these industrial-scale lights will be visible far and wide, from CHS to Carmel Valley to Point Lobos, to Jacks Peak and to Carmel by the Sea and Pebble Beach (Figs. 1 and 2). In many public and residential locations, the CHS stadium lights’ glare and mushroom-cloud-like “Sky Domes” will forever mar residents’ and visitors’ coastal and valley views, wash out treasured sunsets, and obliterate starry nights (Figs. 3 and 4).

CUSD’s Revised Draft Environmental Report was written in 2021, and then re-written in 2022, to answer a fundamental question about the lights: are the predicted impacts of the lights on our shared environment and natural heritage acceptable to the wider Carmel community? Do the purported “social, economic, legal, technical, or other beneficial aspects of the proposed project outweigh the unavoidable adverse environmental impacts”? Like all CEQA reports, the RDEIR was intended to provide the District’s decision-makers – its Board of Trustees – with the information needed to objectively make that balanced and consequential decision in a way we can all live with as a community. It failed.

Instead, CUSD’s massive, convoluted, expensive, and often indecipherable, 400+ page report provides an incomplete, fragmented and often misleading impression of both the benefits and impacts of the proposed lights. For example, as outlined above, the Revised DEIR:

- A. Light Trespass** – The RDEIR provides many “measurements” of light trespass on the CHS grounds without explaining how they were generated, what they mean in practical terms, or how they were used in the visual simulations of viewshed impacts. As a result, those values, whatever their origin, currently have little apparent utility for this analysis.
- B. Who Will See the Lights?** – the RDEIR severely, arbitrarily and without explanation limits the scope of its analysis to an unrealistically small area within a 3.5-mile radius of the CHS stadium. While acknowledging wider visual impacts beyond that limit, the RDEIR inexplicably fails to display these critical results or to discuss their implications for the human residents and visitors to the area. Nor does it discuss predicted impacts to Carmel by the Sea and Pebble Beach.
- C. What Will We See?** – the RDEIR uses a sophisticated spatial analysis to predict how the CHS lights, and the viewsheds behind their glare, may look to viewers in 10 selected vantage points (aka – Key Observation Points). Unfortunately, the results are not useful because many of the landscape images they are based on are seriously flawed (e.g. blurry, foggy), and the vantage points represent an arbitrary and seemingly skewed collection of public spaces with no obvious linkage to the CHS viewshed. As a result, the digital visual simulations they inform provide a very misleading image of viewshed impacts from different vantage points, and completely ignore and marginalize impacts on private residences with a view of CHS.
- D. Vital Views** – the RDEIR fails to consider a central determinant of visual impact from the CHS lights: what important views in the wider Carmel area will be marred by their glare and/or their mere physical intrusion on the viewshed? Chief among them are parks, schools, public spaces, residences, and sacred native American sites.
- E. Sky Domes** – the RDEIR acknowledges that the CHS lights will create bright, glowing, mushroom-shaped Sky Domes on foggy or misty nights, but it provides little useful insight into their frequency of occurrence, impacts on sunsets and starry nights, or contribution to the overall cumulative impacts of artificial light in Carmel’s traditionally dark night skies.

**Despite many unanswered questions, CUSD’s Revised Draft EIR does, however, make one definitive and undisputed conclusion.**

The adverse visual impacts from CHS’ proposed 80’ stadium lights on the environment of Carmel and on the residents and visitors who live, work, and recreate in it will be:

- *Significant,*
- *Unavoidable, and*
- *Impossible to Mitigate to a Lower Level of Impact*

**Questions and Fixes for the Final EIR and CUSD's Board of Trustees**

- A. Does the new RDEIR clearly, objectively, and adequately document the anticipated economic, social, technological and other "benefits" stemming from the proposed CHS stadium lights?
- B. Does the new RDEIR provide meaningful information on the range of risks and impacts posed by the lights to our common visual environment, and to its human uses and values, including to our treasured and iconic coastal and valley viewsheds?
- C. Does CUSD's RDEIR provide sufficient information for its Trustees and the public to assess and weigh the relative "benefits" and "risks" of the proposed CHS lights in a transparent and fair way? objectively and accurately
- D. Are CUSD's Trustees prepared to issue the CEQA-required *Certification of Overriding Considerations* needed to move forward with the Friday Night Lights, in spite of their finding of "Significant and Unavoidable Impacts" with no chance of effective mitigation?

--- END ---



## Response to Letter 114b, Charlie Wahle

1. The commenter presents an overview of their comments on the RDEIR and why they feel the visual analysis contained in the RDEIR is inadequate. Those issues and concerns are presented in the order they are found in the comment letter and addressed in the following responses. No further response is necessary and no changes to the RDEIR are required.
2. The commenter presents their critiques of the RDEIR visual analysis specifically as relates to light and glare and light trespass as presented in the light measurement data contained in the Section 4.0, Project Description, figures (4-2a-c) and Appendix C (Lighting Data). As to how Musco Sports Lighting produces their designs, Musco staff will either use a site plan or satellite image to get a layout of the site, and then we add poles and fixtures in their proprietary photometric software until they have the field and any other ancillary areas up to the light levels and uniformities desired. The data inputs Musco staff would use would be any site plans or satellite image information, any topographical information they have been given, the pole locations/heights, and the inputs associated with the fixture types used (NEMA type, lumen values, etc.) in order to generate their lighting data for a given site.

For additional context, since 1976, Musco Sports Lighting, the school district's sports lighting provider, has focused on the design and manufacture of sports and transportation/infrastructure lighting systems, from hometown Little League fields to professional sports stadiums and ports around the globe. For additional information on Musco Sports Lighting see their corporate website here:

<https://www.musco.com/about-us/>

No changes to the RDEIR are required.

3. The commenter questions the geographic scale of the visual impacts as presented in the RDEIR and specifically in Figure 5-2, Viewshed Analysis Map. The methodology for the visual analysis is detailed in the section titled "Viewshed Analysis and Visual Simulations Methodology" beginning on page 5-15 of the RDEIR. See also response to comment 2 (under "Visual Assessment of Lights") for Letter 2b. No changes to the RDEIR are required.
4. The commenter expresses their concerns over the validity and quality of the visual simulations presented in the RDEIR. See response to comment 2 (under "Visual Assessment of Lights") for Letter 2b as well as Appendix F of the RDEIR for a detailed methodology description of the visual simulations as well as higher resolution versions of each KOP simulation (day and night). See also response to comment 19 for Letter 2c for a list of times taken for each photograph used in the visual simulations.

The commenter also questions why the KOP visual simulations and the CEQA visual analysis more generally were limited to publicly accessible areas. See response to comment 1 for Letter 103a.

The commenter also questions why the school district has not erected story poles or balloons to display the light pole heights. See response to comment 1 for Letter 2c.

The lighting impacts were determined to be significant and unavoidable, and additional visual simulations from one or 100 additional locations would not change that conclusion. Mitigation measures are included in the RDEIR to limit the number of evenings the lights would be used, but the impact remains significant and unavoidable.

No changes to the RDEIR are required.

5. The commenter questions the adequacy of the RDEIR review and evaluation of the project's impact on coastal, valley and mountain viewsheds designated as "sensitive" both on a community level and at the official (i.e., County) level. Environmental effects associated with scenic vistas and scenic resources are addressed in Section 5.0, Aesthetics, of the RDEIR. This section of the RDEIR evaluates project impacts to those areas designated as "sensitive" and "highly sensitive" according to the Monterey County "Scenic Highway Corridors & Visual Sensitivity - Greater Monterey Peninsula Map" and acknowledges the project's close proximity to an official designated State Scenic Highway (State Route 1). Note: The RDEIR incorrectly identified the project site as being in a "highly sensitive" area on page 5-3 of the RDEIR; it is in a "sensitive" area. This correction has been made. See Section 3.0, Changes to the RDEIR, in this final EIR. With respect to consultations with native American tribes, please refer to subsection 13.4 of Section 13.0, Tribal and Cultural Resources, of the RDEIR.
6. The commenter also questions the adequacy of tribal consultation and overall consideration of tribal resources in the RDEIR. Tribal cultural resource impacts and an overview of the school district's efforts to conduct a required tribal consultation process under Assembly Bill (AB) 52 is detailed in Section 13.0, Tribal and Cultural Resources, of the RDEIR. Potential impacts to tribal and cultural resources were identified and mitigation measures were included. As detailed in this section of the RDEIR, on March 29, 2021, the school district sent an offer of consultation letter to the tribal representative of the Ohlone/Costanoan-Esselen Nation. No response to the offer of consultation was received. On August 5, 2022, the school district sent a follow-up notification to the tribal representative of the Ohlone/Costanoan-Esselen Nation. The notification detailed the changes made to the proposed project since the original consultation letter had been sent. No response to this follow-up notification has been received by the school district as of November 7, 2022. The

Ohlone/Costanoan-Esselen Nation tribal representative was also included on all school district distribution lists and notifications associated with the original DEIR and RDEIR review processes, including the Notice of Preparation and Notice(s) of Availability.

No changes to the RDEIR are required.

7. The commenter addresses project impacts associated with the “sky glow” effect and whether the RDEIR adequately discloses the number of times this effect will take place. Sky glow was addressed in Section 5.0, Aesthetics, of the RDEIR. See also response to comment 2 (under “Atmospheric Conditions”) for Letter 2b. The impact was determined to be significant and unavoidable. Mitigation measures are included in the RDEIR to limit the number of evenings the lights would be used, but the impact remains significant and unavoidable. No changes to the RDEIR are required.
8. The commenter summarizes their concerns and comments on the RDEIR, but does not raise any new environmental issues. Responses to these concerns and comments are presented above. No further response is necessary and no changes to the RDEIR are required.
9. The commenter summarizes what they view as the important factors the Board of Trustees must weigh as part of the project consideration process. A decision on the project’s merits will be made by the Board, who will consider all comments. Regarding CEQA findings and statement of overriding considerations, see comment 2 for Letter 2b. No changes to the RDEIR are required.

**Public Comment on CUSD's Revised DEIR for Proposed CHS Improvements**  
**Charles M. Wahle, Ph.D.**  
**Carmel, CA**  
**Oct. 10, 2022**

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**TOPIC #2:**  
**ALTERNATIVES**

**IMPORTANT NOTE**

These Public Comments are based on my assessment of the 2022 RDEIR. They are unique and are not duplicates of potentially similar comments submitted by other concerned residents of Carmel. Therefore, they should be evaluated and responded to independently in the Final EIR.

**OVERVIEW OF COMMENTS**

The value of the CEQA review process is to fully and objectively consider the pros and cons of different ways of achieving the proposed project's objectives. The RDEIR presents 5 Alternatives to the main proposal of installing stadium lights and infrastructure improvements at CHS. None of the 5 Alternatives include stadium lights (aka – The Project). Only one (#2) includes Late Start. CUSD's current Alternatives are:

1. No Project-No Late Start
2. No Project-With Late Start
3. Reduced Project Alternative with After Dark Practices and Games at Alternative Locations (Monterey Peninsula College and Pacific Grove High School)
4. Alternative Location (New, Lighted Stadium at Carmel Middle School) for Practices and Games
5. Reduced Project Alternative (No Stadium Lights).

Alternatives, including the preferred plan (i.e. The "Project"), were ranked in the RDEIR according to their "Environmental Superiority" based on their predicted adverse impacts. Not surprisingly, the proposed Stadium Lights proposal meets the RDEIR's current Objectives, while faring relatively poorly on the Environmental Superiority ranking, largely due to its predicted impacts from the associated light and noise pollution, and traffic and parking safety concerns. Other Alternatives, all of which lack the stadium lights, rank higher in Environmental Superiority but fail to meet all of the stated Objectives, leading the reader inexorably toward the Friday Night Lights project. Is this a *feature or a bug in the analysis*?

My comments below address CUSD's choice and assessment of Alternatives. Additionally, I provide a ***New Proposed Alternative*** designed to:

- enable Late Start in Fall 2023;
- achieve CUSD's substantive educational, athletic, safety and infrastructure Objectives; and,
- avoid the widespread, very problematic "Significant and Unavoidable" environmental impacts created by the CHS Stadium Lights.

## PROBLEMS WITH THE ALTERNATIVES IN THE RDEIR

The RDEIR's treatment of Alternatives contains logical and structural problems that hinder their analysis and may subtly skew the CUSD Trustee's ultimate decision on the lights. Chief among them are:

1. The main project proposal (i.e. "The Project": stadium lights and other amenities) also offers a wide and disparate suite of long-needed infrastructure 'improvements' that also target new traffic and parking impacts created by night games. These largely worthwhile and long-awaited campus improvements are then sequentially withheld in the other Alternatives. This seemingly punitive approach creates the appearance of biasing the evaluation of Alternatives and pre-determining the outcome toward stadium lights.
2. The Alternatives do not fully explore other practical approaches to meeting the primary substantive Objectives, particularly those that could enable Late Start without stadium lights.

The fundamental question now facing CUSD and its constituents is this:

*Does CUSD's RDEIR provide a sufficiently objective and creative assessment of Alternatives to the stadium lights plan to make an informed selection among the options presented?*

In my view, it does not, largely because the many unexplored and self-reinforcing linkages of issues scattered throughout the RDEIR thoroughly obscure whether CUSD's plan will generate the desired outcome. Perhaps more importantly, several crucial and defining questions currently remain unresolved in the RDEIR and in the public arena, even though each can profoundly impact the entire rationale for CUSD's plans. For example:

- Will CUSD commit to implementing Late Start? If CUSD does not implement Late Start, the primary rationale for the stadium lights is eliminated, and the entire Friday Night Lights proposal becomes a very expensive and impactful "want, not a need" justified solely by "improving school spirit". If CUSD does pursue Late Start, the RDEIR still has not convincingly shown that the best and only solution to reclaiming afternoon practice times lost to later and darker school days is to create artificial daylight for practices and games with 80' stadium lights. Where are the other options? To be credible, the Final EIR must provide a wider, more practical and more creative range of Alternatives.
- If CUSD does implement Late Start, will adjusting bell and bus schedules allow CHS to achieve the same sports and academic goals, without having to install 80' stadium lights and create "Significant and Unavoidable Impacts" on Carmel's environment. Many other CA schools, including Monterey HS, have successfully made that transition without impacts to sports or academics. The RDEIR does not explain why this obvious and tractable solution cannot be done. Where is the evidence? The Final EIR must address this issue directly and honestly with real data, plans and options for bell and bus schedules.

- What will happen if the pending Daylight Protection Act of 2021, already passed by the US Senate, is enacted soon? The resulting extra hour of afternoon daylight during the school year will enable longer practices and, thus, remove the scheduling challenges posed by Late Start. It will also make the stadium lights unnecessary and an extravagantly irresponsible fiscal decision. Where is the analysis of this eventuality? The Final EIR must explicitly address this important possibility and present an action plan for how CUSD will adapt to the permanent expansion of the daylight school days.
- Will CUSD's CHS stadium lights plan (i.e. The Project), and all the otherwise beneficial actions bundled along with it, be stalled by potential operational obstacles or legal challenges? If so, CUSD will remain where it was at the beginning of this process: ill-equipped to address the need and challenges that call for Late Start, whether it is implemented or not. CUSD's Final EIR must discuss this contingency – and its effects on their plans and budgets - however painful it may seem.

Clearly, this is *a lot of uncertainty about very consequential issues*, many of which are outside of CUSD's control. Each can profoundly determine the outcome, effectiveness, and wisdom of "The Project. Any could instantly eliminate the need and rationale for stadium lights at CHS and/or seriously delay their installation. Should that happen, CUSD will have spent millions of public education dollars for environmentally impactful stadium lights that they will demonstrably not need and cannot justify, without having implemented other practical approaches to dealing with implications of Late Start. CUSD's Final EIR needs to provide a fuller and more meaningful examination of operational consequences of these possibilities before asking its Trustees to vote on this proposal.

### PROPOSED NEW ALTERNATIVE FOR THE FINAL EIR

Carmel's kids need more sleep – for academics, sports, social life, and mental wellness. Fortunately, there is a better and more responsible way for CUSD to provide it. Here, I propose a straightforward, common-sense, stepwise, and evidence-based approach that meets many of the original project's Objectives (including well-rested and healthy students) without imposing widespread significant impacts to the CHS and Carmel-area environment or to the people who live, work, visit and recreate here.

In this new 2-phase Alternative, most of the important infrastructure, safety, and operational improvements in proposed project are included – including Late Start. The CHS stadium lights are not installed initially, but may be considered among other alternatives, based on the objective results of a 3-year pilot project that evaluates how effectively Late Start, coupled with adjustments to CHS' bell and bus schedules, accommodates afternoon sport practices.

#### **Phase 1: Implementation** (begins in AY 2022-23)

##### **A. Bell and Bus Schedules:** Plan Now and Implement Late Start in Fall 2023

- Complete ongoing consultations with CUSD stakeholders
- Adjust bell schedules for Fall 2023
- Adjust bus schedules for Fall 2023



- Examine feasibility of decoupling bus schedules and routes for CHS, CMS and CRS
- Add additional buses and drivers as needed
- Coordinate field sports practices schedules around Late Start
- Implement Late Start in Fall 2023

**B. Safety:** Improve Traffic Safety and Parking on CHS Campus beginning in 2023

- Create new parking spaces behind the East and Southeast sides of campus
- Consult with stakeholders on priority problems and solutions
- Conduct a thorough traffic and parking study
- Implement official and voluntary measures to manage traffic and parking

**C. Facilities:** Further Improve and Modernize CHS Sports Facilities beginning in 2023

- Install Dark Sky technology and shorten Pool Lights
- Repair, not replace, CHS campus tennis courts
- Construct storage facility and roof-top spectator platform at football stadium
- Replace or repair other storage facilities

**Phase 2: Evaluation and Adaptation** (data collection begins in AY 2023; evaluation in AY 2026)

- Evaluate, using objective metrics, the effectiveness of the above measures in achieving CHS' academic, athletic and infrastructure objectives under Late Start.
- Involve professional evaluators and public stakeholders in designing the evaluation and analyzing its results.
- If the evaluation's findings reveal no problems, then make necessary minor adjustments and continue with the plan.
- If the evaluation's findings reveal significant problems related to Late Start's impacts on afternoon activities, then recommend to the CUSD Trustees a set of practical, needs-based options for adaptations to this plan, including, if suggested by the evidence:
  - moving certain sports to the CMS campus, with or without new construction;
  - facilitating off-campus night games elsewhere;
  - supporting the development of local club-sports for smaller and emerging teams needing access to a playing field; and,
  - installing lower-intensity, practice lighting at CHS' stadium

The costs of these valuable improvements to Carmel High School's operation and infrastructure could be covered by the savings realized by not installing the proposed stadium lights. The benefits to well-rested students will pay dividends for generations. We can do this.

-- END --

## Response to Letter 114c, Charlie Wahle

1. The commenter summarizes the alternatives provided in Section 18.0, Alternatives, of the RDEIR. The commenter appears to question the ranking of the alternatives in terms of “environmental superiority” as the rankings favor the proposed project in his opinion. As described in the RDEIR, page 18-1, CEQA Guidelines section 15126.6(a) requires a description of a range of reasonable alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. It also requires an evaluation of the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. See also response to comment 1 for Letter 2b regarding formulation of project objectives.

CEQA Guidelines section 15126.6(e)(2) states that if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. The RDEIR determined that Alternative 2, No Project Alternative – With Late Start, was the environmentally superior alternative. The proposed project was ranked fourth (tied with Alternative 3) out of five alternatives presented in terms of environmental superiority. Of the non-“no project” alternatives, Alternative 5, Reduced Project (No Stadium Lights), was the environmentally superior alternative.

The commenter then outlines a proposed new alternative which will be addressed further in responses below in response to comment 3.

No changes to the RDEIR are required.

2. The commenter presents what they feel are the logical and structural problems of the alternatives proposed in the RDEIR. Each of these identified problems is addressed below in the order presented in the comment letter:
  - a. The commenter argues that largely worthwhile and long-awaited campus improvements are sequentially withheld in other alternatives. This is not correct as Alternative 5 – Reduce Project Alternative (No Stadium Lights) contains all other project components (new parking lots, pool replacement lights, etc.).
  - b. The commenter argues that the alternatives as presented in the RDEIR do not fully explore other practice approaches to meeting the project objectives. Refer to response to comment 2c for Letter 22, which that addresses CEQA requirements for the evaluation of a reasonable range of alternatives to meet the basic project objectives.

**Objective and Creative Assessment of Alternatives.** The commenter presents what he feels is the fundamental question facing the school district about the RDEIR. He asks if the RDEIR provides a sufficiently objective and creative assessment of alternatives to the stadium lights to make an informed selection among the options presented. Providing for a “creative assessment” is not a purpose of the RDEIR and the alternatives presented. As previously noted, CEQA Guidelines section 15126.6(a) requires a description of a range of reasonable alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. It also requires an evaluation of the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. Additionally, CEQA Guidelines section 15126.6(b) further requires that the discussion of alternatives focus on those alternatives capable of eliminating any significant adverse environmental impacts or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. The EIR must present enough information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

**Late Start Questions.** The commenter presents two sets of questions regarding the possible implementation of the Late Start Law. Responses to these two sets of questions are presented below:

- *Commitment to Late Start.* The school district is currently considering options for Late Start implementation. In response to the commenters statement that the RDEIR does not present options or more practical and creative alternatives, see response above regarding “Objective and Creative Assessment of Alternatives.”
- *Bell and Bus Schedule Adjustment.* The school district has already determined that they cannot implement late start without adversely affecting the athletic programs unless they put in stadium lights (at the high school or middle school) or practice and play elsewhere (Pacific Grove High School and/or Monterey Peninsula College). In addition, the school district uses a staggered transportation system and cannot change a schedule at one site without impacting all. Therefore, adjusting the bell schedule is not an option.

- The commenter notes that many other California schools, including Monterey High School, have successfully made the transition to Late Start. While many schools have made the change, it is hard to generalize and categorize all or most schools as "successful" and "without impacts". The commenter provides no evidence that Monterey Peninsula Unified School District has implemented Late Start successfully and without impact. Each school has variables such as the number of fields, sports and teams which makes a generalized statement about late start impacts inaccurate.

**Daylight Protection Act.** The commenter also questions why the RDEIR does not address the Daylight Protection Act of 2021. See response to comment 5 (under “Sunshine Protection Act and Alternative 2”) for Letter 2b.

**Uncertainty and Potential Project Obstacles.** The commenter states the Final EIR must address the potential uncertainty, operational obstacles or legal challenges the project may face. This comment is noted; however, it does not raise an environmental issue and therefore, no response is necessary.

No changes to the RDEIR are required.

3. The commenter proposes a new alternative. Refer to response to comment 2c for Letter 22, which that addresses CEQA requirements for the evaluation of a “reasonable range of alternatives.” In addition, it should be noted:

- a. As already stated above under “Late Start Questions,” the school district has already determined that they cannot implement late start without adversely affecting the athletic programs unless they put in lights) or practice and play elsewhere. Therefore, adjusting the bell schedule is not an option. This alternative results in reduced athletic programs. Please see also discussion of Alternative 2 in the RDEIR.

Enabling Late Start and no stadium lights is already proposed under Alternative 2. Please refer to Section 18.0, Alternatives, in the RDEIR.

Regarding the commenter stating that the alternatives not including Late Start, Late Start would be implemented with Alternatives 3 and 4. If Late Start were not implemented, there would be no need for Alternatives 3 and 4. Late Start is addressed in discussion for objectives 3 and 4.

- b. Regarding the commenter’s proposed Phase 1 and Phase 2 implementation, it appears the commenter has taken components from the proposed project (e.g., add new parking and storage facility with roof-top spectator area) and components from the alternatives presented in the RDEIR (Alternative 3 – After Dark Practices and Games at Alternative Locations and Alternative 4 – Alternative Location for

Practices and Games) and created his own. The comment does not include any significant new information. Moreover, the commenter has offered no evidence showing that his proposed alternative is necessary to informed decision-making nor feasible or environmentally superior to the proposed project or alternatives studied in the RDEIR. Moreover, the commenter does not indicate whether his proposed alternative meets the project objectives. However, this alternative is infeasible and does not offer substantial environmental advantage for the same reasons as Alternative 3 and Alternative 4, respectively. Please refer to further discussion in Section 18, Alternatives, of the RDEIR.

Please also see responses to Letter 2c, comment 22, Letter 14-1-g, comment 4, and Letter 14-2-g, comment 2.

The school board has the discretion to approve the proposed project, any of the alternatives, or a combination of the alternatives. A decision on the project's merits will be made by the Board, who will consider all comments. Please also refer to response to Letter 2b, comment 1.

No changes to the RDEIR are required.

From: **Charles Bates** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 7:53 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting several comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree with a number of details of the RDEIR, summarized below:

A number of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.

The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.

The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant". I feel this is due to study inaccuracies and project bias.

The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Finally, Carmel, of all places in the environmental sensitive sphere, should be first and foremost concerned with the prevalent and growing problem of "Light Pollution". It is real, it adversely affects people, and adversely impacts view sheds and wild lands. "Light Pollution" can and ought to be aggressively mitigated.

The flaws/issues in the RDEIR, enumerated in the many other submissions, need to be



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con't.

corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward as is.

Charles Bates

[bateschipjan@gmail.com](mailto:bateschipjan@gmail.com)

577 Viejo Rd

Carmel, California 93923

## Response to Letter 115, Charles Bates

1. See responses to Letter 2b.

From: **Evagelia Paxos** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 4:42 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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con't.

## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

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expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

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- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not



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B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

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The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

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B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Evagelia Paxos

[lpaxos@optonline.net](mailto:lpaxos@optonline.net)

7 Eldorado Drive

Succasunna, New Jersey 07876

## Response to Letter 116, Evagelia Paxos

1. See responses to Letter 2b.

From: **james paxos** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 4:43 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

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C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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james paxos

[jprealty58@gmail.com](mailto:jprealty58@gmail.com)

7 Eldorado Drive

Succasunna, New Jersey 07876

## Response to Letter 117, James Paxos

1. See responses to Letter 2b.

From: **Carole Rein** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 5:48 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

- i. Lights recommendations for Wellesley HS:

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

- i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

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B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely

expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not

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perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmljXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Carole Rein

[carolerein@mac.com](mailto:carolerein@mac.com)

3636 Lazarro Drive

Carmel by the Sea, California 93923

## Response to Letter 118, Carole Rein

1. See responses to Letter 2b.

From: **Mary Rice** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 7:10 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights REJECT Stadium Improvement!  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1 I have read the released new revised Draft EIR and am highly concerned about the impact and issues the proposed lights would cause. I OBJECT to the Stadium Improvements, urge the Board not to approve this project and emphatically disagree with many points put forward in the RDEIR.

The following is a fair and accurate overview of my reasoning CUSD MUST RJECT the Stadium Improvement.

Please do the right thing.

2 I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any



explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

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"Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

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Mary Rice

[maryrmgmt@gmail.com](mailto:maryrmgmt@gmail.com)

27200 Prado Del Sol

Carmel, California 93923

## Response to Letter 119, Mary Rice

1. The commenter expresses their opposition to the proposed project but does not raise an environmental issue. Therefore, no response is necessary.
2. See responses to Letter 2b.



From: **Maria Sutherland** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 5:47 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not

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perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light poles will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmljXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Forget it!!

Maria Sutherland

[maria@mariasutherland.com](mailto:maria@mariasutherland.com)

PO Box 613

Carmel, California 93921



## Response to Letter 120, Maria Sutherland

1. See responses to Letter 2b.

From: **ROBERTS, WILLIAM T** <[wr2738@att.com](mailto:wr2738@att.com)>  
Date: Wed, Oct 5, 2022 at 9:21 AM  
Subject: CHS Lights Comment  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: [getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org) <[getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org)>

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## **Citizen Comment: Carmel High School Lights Project**

My name is Todd Roberts, I'm a lifetime resident of Carmel and my entire family including myself attended Carmel High School. For the last ten years I've been coaching a composite (multi high school) cross-country mountain bike team in our area and have worked with hundreds of young adults. Cross-Country Mountain bike racing is one of the fastest growing high school sports in the nation, growing at over 20% per year. Sport such as Girls Water Polo and Basketball, lacrosse, and Cross-Country Running have similar growth rates.

I'm writing to you to express my deep concerns regarding the High School Lights project. There are the obvious reasons; permanent Light Pollution, Noise, Parking, and as we've seen from two recent Friday Night Lights events, crime and danger for police and youth. However, my main complaint is in regards to the promotion of Football and it's culture as if it would benefit the entire student body. A sport that is only physically accessible to a small subset of individuals, and known as being coupled to one of the highest injury rates in high school athletics.

This contrasts with modern sports leagues that are based on the pillars of Inclusivity, Equity, Respect, and Community. I realize that some supporters will claim that many different sports could use the lights, but the real push is for Football and specifically the Friday night games. The money required to install those lights, build the needed access road, and create parking would go a long way towards promoting youth sport in general. In fact, that kind of funding would be absolutely transformative for many valuable programs. In my humble opinion, the project promoters are clinging on to a mentality that's completely out of date and is not aligned with the needs of the greater student body, or the community.

Best regards,

Todd Roberts

(Head Coach) Monterey Bay Lightfighters MTB

**Todd Roberts**

Lead Systems Engineer 4

Office: 831.649.2053 | Mobile: 408.439.2549

## Response to Letter 121, Willam T. Roberts

1. The commenter expresses their general concerns regarding the proposed project's impacts associated with light pollution, noise, parking, and crime and danger (based on recent local high school football games in the area). Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR. Noise impacts are addressed in Section 10.0, Noise, of the RDEIR. Parking impacts are addressed in Section 11.0, Transportation and Parking, of the RDEIR. The comment about crime and danger does not raise an environmental issue, and such alleged incidents at other high schools are not the subject of the RDEIR. See also response to Letter 14-4-d. Therefore, no response is necessary. No changes to the RDEIR are required.

From: **Sharon M Runde** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 12:47 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the

scenic vistas and visual character of Carmel:

- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

- i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>
- ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely



expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

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Respectfully,

Sharon Runde

Sharon M Runde

[sharon.runde@gmail.com](mailto:sharon.runde@gmail.com)

241 CLAY STREET

MONTEREY, California 93940

## Response to Letter 122, Sharon Runde

1. See responses to Letter 2b.

From: **Robert Phelan** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 11:46 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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(Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

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B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

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The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

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B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

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i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

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iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Robert Phelan

[sphelanrobert@gmail.com](mailto:sphelanrobert@gmail.com)

25443 Carmel Knolls Drive

Carmel, California 93923

## Response to Letter 123, Robert Phelan

1. See responses to Letter 2b.

From: **Susan Roberts** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 12:20 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the

scenic vistas and visual character of Carmel:

- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

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[sroberts@carmelunified.org](mailto:sroberts@carmelunified.org)

25910 S. Carmel Hills Drive

Carmel, California 93923

## Response to Letter 124, Susan Roberts

1. See responses to Letter 2b.



From: **Martin Goldman** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 1:19 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Martin Goldman

[brooklynboymarty@gmail.com](mailto:brooklynboymarty@gmail.com)

Carmel , California 93923



## Response to Letter 125, Martin Goldman

1. See responses to Letter 2b.

From: **Scott Highton** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 4:36 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the

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scenic vistas and visual character of Carmel:

- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

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Scott Highton

[scott@highton.com](mailto:scott@highton.com)

Carmel, California 93921

## Response to Letter 126, Scott Highton

1. See responses to Letter 2b.

From: **Lindamarie Rosier** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 3:03 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

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Lindamarie Rosier

[lindamarierosier@aol.com](mailto:lindamarierosier@aol.com)

P.O.Box 7292

Carmel, California 93921

## Response to Letter 127, Lindamarie Rosier

1. See responses to Letter 2b.

From: **Anne Sosna** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 4:25 PM  
Subject: Stadium Lights - I am submitting this at the request of family that lives nearby.  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the

scenic vistas and visual character of Carmel:

- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

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B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely



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expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

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E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not

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perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

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Anne Sosna

[flynphil@pacbell.net](mailto:flynphil@pacbell.net)

PO Box 3693

Carmel by the Sea, California 93921

## Response to Letter 128, Anne Sosna

1. See responses to Letter 2b.

From: **Memel Rosier** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 3:05 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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P.O.Box 7292

Carmel, California 93921

## Response to Letter 129, Memel Rosier

1. See responses to Letter 2b.

From: **wallace notley** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Wed, Oct 5, 2022 at 7:11 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqqykOWRp60fDM\\_IrzigQMFtarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqykOWRp60fDM_IrzigQMFtarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the

scenic vistas and visual character of Carmel:

- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

- i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

- i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>
- ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely

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expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not

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perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwitAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmljXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

wallace notley

[wwnotley@gmail.com](mailto:wwnotley@gmail.com)

25865 south carmel hills dr

CARMEL, California 93923

## Response to Letter 130, Wallace Notley

1. See responses to Letter 2b.





DEPARTMENT OF FISH AND WILDLIFE

Central Region  
1234 East Shaw Avenue  
Fresno, California 93710  
(559) 243-4005  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



Letter #131

October 5, 2022

Dan Paul, Chief Operations Officer  
Carmel Unified School District  
4380 Carmel Valley Road  
Carmel, California 93923

**Subject: Carmel High School Stadium Improvements  
Revised Draft Environmental Impact Report (RDEIR)  
SCH No.: 2021050293**

Dear Mr. Paul:

1 The California Department of Fish and Wildlife (CDFW) received a Revised Draft Environmental Impact Report from Carmel Unified School District for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

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

#### **CDFW ROLE**

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

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

Dan Paul, Chief Operations Officer  
Carmel Unified School District  
October 5, 2022  
Page 2

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

## **PROJECT DESCRIPTION SUMMARY**

**Proponent:** Carmel Unified School District

**Objective:** The Project proposes the following improvements at Carmel High School: 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 to the existing main campus parking lot to the north, and a new pedestrian walkway. The 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.

**Location:** The Project site is located at Carmel High School, 3600 Ocean Avenue at State Route 1, Carmel, in Monterey County.

**Timeframe:** N/A

2

## **COMMENTS AND RECOMMENDATIONS**

**Mitigation Measure 7-3:** Mitigation Measure 7-3 of the RDEIR states that nesting bird surveys will be conducted at a minimum survey radius surrounding each work area as follows: 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. The mitigation measure states that an appropriate buffer between each nest and the active construction will be established, but no avoidance buffer distances were specified.

CDFW encourages implementation of Project construction activities during the bird non-nesting season. However, if ground-disturbing activities must occur during the breeding season (i.e., February through mid-September), CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. The Project's applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes as referenced above.

Dan Paul, Chief Operations Officer  
Carmel Unified School District  
October 5, 2022  
Page 3

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### ENVIRONMENTAL DATA

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

<https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be emailed to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov). The types of information reported to CNDDDB can be found at the following link:

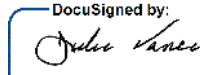
<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

### FILING FEES

If it is determined that the Project will impact fish and/or wildlife, an assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). With this cursory review, CDFW anticipates that the Project will require the payment of fees.

CDFW appreciates the opportunity to comment on the Project to assist Carmel Unified School District in identifying and mitigating the Project's impacts on biological resources. If you have any questions, please contact Jim Vang, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 580-3203, or by electronic mail at [Jim.Vang@wildlife.ca.gov](mailto:Jim.Vang@wildlife.ca.gov).

Sincerely,

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

ec: Jeff Cann; [Jeff.Cann@wildlife.ca.gov](mailto:Jeff.Cann@wildlife.ca.gov)  
CDFW

## Response to Letter 131, California Department of Fish and Wildlife (CDFW) Central Region

1. This comment is the department's standard introduction to their comment letters. It includes their role in the process, their jurisdiction over active bird nests, and a summary of the project description. This comment does not raise an environmental issue and therefore, no response is required.
2. This comment is about Mitigation Measure 7-3 of the RDEIR. The measure includes survey radii but does not include avoidance buffer distances if nesting activity is observed. The RDEIR will be modified to include the no-disturbance buffers recommended by CDFW. This mitigation measure has been revised in the RDEIR to include the no-disturbance buffers. See Section 3.0, Changes to the Revised Draft EIR, of this final EIR.
3. This comment is the department's standard closing text in their comment letters. It identifies when information developed in CEQA documents must be incorporated into their database and the necessary filing fees when filing a Notice of Determination. This comment does not raise an environmental issue and therefore, no response is required.

From: <[zancan@aol.com](mailto:zancan@aol.com)>  
Date: Thu, Oct 6, 2022 at 9:27 AM  
Subject: Re: RDEIR Feedback: Carmel-by-the Sea (Sphere of Influence)  
To: [budget4jh@gmail.com](mailto:budget4jh@gmail.com) <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>, [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: [shinds@carmelunified.org](mailto:shinds@carmelunified.org) <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, [snachbar@carmelunified.org](mailto:snachbar@carmelunified.org) <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, [arosen@carmelunified.org](mailto:arosen@carmelunified.org) <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>, [kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org) <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, [tarthur@carmelunified.org](mailto:tarthur@carmelunified.org) <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>

1 | It is not appropriate to ask about conversations with public officials. Those are not appropriate questions that they must answer.

Alexander T. Henson  
831-659-4100

**CONFIDENTIAL AND/OR ATTORNEY-CLIENT PRIVILEGED COMMUNICATION**

The unauthorized disclosure or interception of email is a federal crime; 18 U.S.C. § 2517(4). This electronic message transmission contains information which may be confidential or privileged. If you have received this electronic transmission in error, you are advised not to read this email, and not to disclose, distribute, or copy this message and/or attachments. Please immediately notify The Law Office of Alexander Henson, either by telephone at (831) 659-4100 or by electronic mail if you have received this email in error, and delete it from your system.

-----Original Message-----

From: Bud Get <[budget4jh@gmail.com](mailto:budget4jh@gmail.com)>  
To: CUSD Feedback <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: [shinds@carmelunified.org](mailto:shinds@carmelunified.org); [snachbar@carmelunified.org](mailto:snachbar@carmelunified.org); [arosen@carmelunified.org](mailto:arosen@carmelunified.org); [kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org); [tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)  
Sent: Thu, Oct 6, 2022 6:28 am  
Subject: RDEIR Feedback: Carmel-by-the Sea (Sphere of Influence)

**On Page 319: RDEIR highlights that the City of Carmel-by-the-Sea would be part of the impacted geographic scope for this project.**

**Questions:**

- What part of their General Plan would you be in violation of?
- Given the light pollution would spill to their jurisdiction, what are the next steps in addressing the significant and unavoidable impacts to their geography?
- Given the significant increase in traffic congestion, what are the next steps in addressing the significant and unavoidable impacts to their geography?

- Given the regulated trees create a welcoming environment to the top of their city, what are the next steps in addressing the significant and unavailable impacts to their geography?
- Page 379: You referenced consulting Swanson, Brandon, Community Planning & Building Director, City of Carmel-by-the-Sea, 7 June 2021; 29 July 2022. Can you provide us with the specific details of the discussion?
- Page 390: You referenced consulting Swanson, Brandon, Planning & Community Development Director, City of Carmel-by-the-Sea. Phone conversation with consultant, dated 7 June 2021. Can you provide us with the specific details of the discussion?

**We believe you would be violating at minimum the following areas from their General Plan. Please respond with more detail on each concern.**

- Aren't you violating the preservation of the unique community that prides itself on its village character?
- Isn't the Project's location in the City's Sphere of Influence as identified in the Land Use Element of the General Plan?
- Isn't the proposed project inconsistent with Policy P1-127 of the Land Use Element of the General Plan that encourages areas in the Sphere of Influence to continue the existing pattern of low density development?
- Isn't the proposed project inconsistent with Objective O1-23 of the Land Use Element of the General Plan that encourages the City to support efforts to reduce congestion on Highway 1?
- Isn't the proposed scale and density of the project inconsistent with the character of the surrounding neighborhood?
- Won't the project create negative traffic and circulation impacts on the resident in the area?
- Won't the project degrade streets maintained by the City of Carmel by the Sea? Entry point of CBTS to the school entrance is a few blocks away. Traffic re-routing and back-up will be endless
- Won't the project risk the removal of significant Monterey Pine and Coast Live Oak Trees that should be preserved?

vicinity of the high school (see Table 15-2 below).

**Table 15-1 Cumulative Impact Analysis Geographic Scope**

Resource Area	Geographic Area
Aesthetics	State Route 1 corridor, between State Route 68 and Carmel Valley Road including portions of Hatton Canyon, the City of Carmel-by-the-Sea, and western most portions of Carmel Valley
Air Quality	Air Quality: North Central Coast Air Basin
Biological Resources	Unincorporated Monterey County (greater Carmel and Carmel Valley)
Cultural, Paleontological, and Tribal Resources	Historic and Archaeological Resources: City of Carmel-by-the-Sea, the State Route 1 corridor between State Route 68 and Carmel Valley Road, and surrounding unincorporated areas Paleontological Resources: Monterey County
Energy	State of California
Greenhouse Gas Emission	State of California
Noise	Projects that add traffic to State Route 1 and/or surrounding roads (traffic noise) Projects in the immediate vicinity with operational noise affecting the sensitive receptor nearest to Carmel High School (operational noise)
Transportation	Unincorporated Monterey County (greater Carmel and Carmel Valley)
Soils, Erosion, and Water Quality	State Route 1 corridor, between State Route 68 and Carmel Valley Road including portions of Hatton Canyon, the City of Carmel-by-the-Sea, and western most portions of Carmel Valley
Recreation	Carmel High School, Carmel Middle School, and public tennis courts within a five-mile radius

SOURCE: EMC Planning Group 2022



## Response to Letter 132a, Alexander Henson

1. The commenter is addressing the appropriateness of asking about conversations with public officials. No environmental issues are raised and therefore, no response is required.

The comment also forwards an email containing comment Letter 14-5-i. Please refer to response to Letter 14-5-i.

## ALEXANDER HENSON

P.O. Box 1381, Carmel Valley, CA 93924

831 659-4100 | Email: zancan@aol.com

**October 10, 2022**

Dan Paul  
Chief Operations Officer  
Carmel Unified School District  
4380 Carmel Valley Road  
Carmel, CA 93923  
[feedback@carmelunified.org](mailto:feedback@carmelunified.org)

Re: RDEIR Carmel High School Stadium Improvements

Dear Sirs:

1 I am writing on behalf of SAVE CARMEL, an unincorporated nonprofit association, to address the Revised Draft Environmental Impact Report prepared for the proposed "Carmel High School Stadium Improvements". It is clear the scope of the project has expanded from just stadium lighting to include a stadium viewing platform and storage, swimming pool lighting, expansion of parking areas on the eastside of campus, tennis court removal for increased parking and on campus traffic circulation. The RDEIR fails to provide much of the information needed for informed public participation and decision-making.

### Stadium Lights

2 The analysis the environmental impacts is still woefully deficient. While the RDEIR acknowledges the impacts of the stadium lights will be a significant adverse unavoidable impact, it barely scratches the surface of what those adverse impacts will be. The assessment presented in the RDEIR fails to assess any impacts on humans, animals or plants. Light at night disrupts circadian rhythms. For approximately much of the year the lights will be on 5 evenings per week for practices and the games. The scientific literature documents how light at night affects almost all living creatures from zooplankton to humans. There was no assessment of how many homes within the viewshed of the stadium lights had windows facing the stadium lights. How many nursing homes are in the viewshed of the lights? What bat flight paths are in the stadium lights' viewshed? There are studies that show plants, including cypress trees, maturing in a dark night sky environment react adversely to the introduction of light at night. There needs to be a much more thorough analysis of the adverse biological impacts from the introduction of light at night together with an assessment of how this project will impact the community.

A glaring oversight concerns the lack of modeling showing the impacts of the marine layer of fog which will create a reflective light dome over the stadium lights substantially increasing the illumination therefrom and obliterating our naturally dark sky. Given the local climate this is a frequent occurrence. There is no mention in the RDEIR as to how this will affect the environment.

Similarly, there is no assessment of the cumulative impacts when both the pool lights and stadium lights are on. How does that change the amount of illumination?

2  
con't.

The exposition of the computer modeling results of light trespass, p.5-16, would be more assuring if its predictive capacity were tested with a real world example like the stadium lights for the Monterey Sports Center ball fields. Has this computer model been calibrated with an as-built example to determine its accuracy?

A potential mitigation measure to lessen environmental impacts is to change the color of the lighting to make the color more like that enjoyed in our homes, instead of the bright white, more of an amber color.

In the NOP comments in the RDEIR is an unpaginated letter from Meredith Nole who suggests, "lens and glare shields from lower angles to eliminate air space lighting spillover." This is not mentioned in the RDEIR. Why is this not a feasible mitigation measure?

3

#### Transportation

The "Transportation Management Plan" (TMP) is not the panacea envisioned by in the RDEIR. The most obvious, and dangerous, failing is the lack of planning for designated emergency access routes. In the event of an earthquake or fire on campus, where are people to go? It is noted the RDEIR at page 11-14 promises to set forth "Parking Capacity and *Emergency Access*". It does not. Indeed, one searches the RDEIR in vain looking for the Emergency Access Routes.

It appears the district is putting the cart before the horse in proposing new parking lots and a new roadway, all without the benefit of an adopted circulation plan including emergency evacuation routes. It appears the district has adopted a policy of "build it first and then we will make a plan for how to use it effectively."

The numbers estimated for game attendance vary and how they were derived is not provided. The numbers of persons per car estimated at 3.24 seem unrealistically high. It is noted the more rural nature of Concord with its 2.17 persons/car is more reflective of Monterey County than the other more urbane schools chosen for comparison. This would increase the estimated number of parking spaces needed on game night by half again. How does this proposal accommodate higher traffic levels requiring such additional parking if needed?

The TMP will include a policy urging local residents to walk or bike to school on game nights, but there are no sidewalks nor bicycle lanes in the area. The RDEIR should resolve this discrepancy with realistic plans to meet this need.

The "Event No Parking" implementation should provide exception for homeowner residential parking. Exactly how does the TMP affect nighttime parking west of Highway 1?

This proposal will greatly exacerbate the long standing problems with traffic and parking at CHS. Appendix K relates there are operational deficiencies at the beginning and ending of the school day at the intersection of SR 1 and Ocean Avenue. Curiously the TMP does not address this problem, nor is it further referenced for needed circulation improvements. This congestion problem needs to be addressed when one is making decisions concerning the location of additional on-site parking. It is ludicrous to ignore traffic difficulties, fail to develop a comprehensive campus circulation plan and yet proceed to spend public dollars on a new roadway and parking lots.

The pros and cons of the exchange of tennis courts for parking is not clearly stated. What are the repercussions on the overall traffic plan if the tennis courts remain?.

4

#### Impacts to Scenic Highway

Highway 1 along the high school is a designated state scenic highway. While the RDEIR blandly assures the reader there will be no adverse scenic impacts, there is no analysis. What do before and after mock-ups show? How does this comport with the general requirement to leave the scenery untouched in highly sensitive areas from a visibility standpoint? See also "Trees" below.

5

#### Noise

It is surprising the RDEIR, while discussing noise impacts from the project, fails to discuss the extension of the time of elevated noise due to sport practice and the ensuing departing traffic noise levels at the high school. This noise level increase into the evenings should be quantified and disclosed. It is noted there is a public expectation that noise levels will decrease with nightfall. Noise after dark at dinnertime is more impactful than during the day. Because this additional noise is not acknowledged, there is no proposed mitigation. It should be noted noise travels as line of sight so a geographical feature may attenuate noise.

5  
con't. Therefore, every home and structure visible from the stadium will experience noise from the stadium attenuated only by the distance.

Trees

6 The impact on the cypress trees from the roadway proposed next to Highway 1 is of concern. Those trees provide a visual buffer enhancing scenic Highway 1, see p.5-14 and p.5-42, and also a noise buffer for the stadium and the highway. However, the RDEIR fails to analyze whether the proposed new roadway will damage or destroy those trees. Indeed, that study will only be done after project approval. pp.7-32, 7-33. The impact of the project on those trees may be significant depending upon how many need to be replaced. In the absence of knowledge about the potential harm from creation of the new roadway, the proposed mitigation measure of replacement trees cannot be determined to be sufficient mitigation.

Drainage

7 The RDEIR does not address the impacts from the increased water run-off resulting from the creation of more impervious surfaces from the new parking areas and roadway. The homeowner at the corner of Morse Drive and Highway 1 has reported repeated flooding from drainage from the high school upslope from the residence. How will the increased run-off be mitigated to insignificance?

Facts Supporting Overriding Considerations

8 One of the stated goals of the project is to enhance student body spirit by having Friday night football games. Inasmuch as all the away football games are played on Friday nights, how does one assess whether "school spirit" has been increased by 6 home games on a Friday night? How would school spirit be affected if the Friday night before each Saturday afternoon home game there was a school dance?

Alternatives

9 The examination of alternatives is too narrow and presents unverified argument as fact. One alternative that should be closely examined would be the following:

1. Fix the pedestrian pathway lights from baseball field to reflect "green" technology;
2. Repair the tennis courts;
3. Fix the pool lights with LED;
4. Install additional parking on the eastside near the pool;
5. Adjust the bell schedule to accommodate Late Start and sports practices on campus. Provide team members with last class study hall to enable them to start team practice during last period.
6. Implement Late Start for 2023-2024 school year, divert stadium light funds to meet transportation needs;
7. Reexamine Facilities Master Plan for Carmel Middle School for long term growth including stadium;
8. Develop with resident input a permanent "No Parking, Residents Only" parking plan in the immediate vicinity of the high school.

The examination of feasible alternatives suffers from the failure to acknowledge the unique character of Carmel. It is the only incorporated city in California with no street lights. Minimizing light pollution is endemic to Carmel. Any project proposing to increase light pollution should acknowledge this cultural conflict and measure alternatives accordingly.

Alternatives that meet the stated goal of increasing school spirit are not identified. School dances on Friday nights could serve that purpose. Anything that brings students together for a common purpose will enhance school spirit. Nighttime sporting events are not required to increase student spirit. What other actions is the school district considering to enhance student spirit, or is this the only proposal?

Given the change in topography from the high school to the middle school, the area affected by light pollution and the number of persons affected, would be substantially reduced with a lighted stadium at the middle school. What are the growth needs for Carmel High? Should consideration be given to switch the facilities, making the middle school into the new high school? There is more buildable acreage at the middle school site. Why isn't this a feasible alternative?

Sincerely,

*Alexander Henson*

Alexander Henson

## Response to Letter 132b, Alexander Henson

1. The commenter represents the non-profit association, SAVE CARMEL, and notes the RDEIR expands the scope of the project and fails to provide much information, which is addressed in subsequent comments. Those comments are addressed below. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. No changes to the RDEIR are required.
2. The commenter presents a series of concerns about how the RDEIR addresses various impacts associated with the stadium lights. Each of these issues is addressed below.

**Impacts on Humans, Animals, and Plants.** Environmental impacts associated with each of these topics is addressed throughout the RDEIR. Impacts to special-status animal and plant species are addressed in Section 7.0, Biological Resources, of the RDEIR. It is not clear what the commenter means by “impacts to humans;” however, impacts associated with air quality impacts, including short-term construction emissions and potential impacts to human health, are addressed in Section 6.0, Air Quality, of the RDEIR. Regarding lighting impacts on humans, see response to comment 3 of Letter 5.

**Circadian Rhythms.** See response to comment 3 for Letter 5.

**Light Impacts and Scientific Literature.** The commenter presents no citation or examples of the scientific literature they are referencing. Therefore, no response is necessary.

**Homes with Windows Facing the Stadium and Nursing Homes in the Viewshed of the Stadium Lights.** Public views and sensitive receptors are discussed starting on page 5-3 of the RDEIR. The RDEIR is not required to present a visual assessment from every conceivable viewpoint including from all homes with windows facing the stadium and any nursing homes in proximity to the project site. Only publicly accessible viewpoints are required to be evaluated under CEQA requirements (See Appendix G of CEQA Guidelines, under “Aesthetics,” checklist question “c”). See also response to comment 1 for Letter 103a. The visual lighting impact was determined to be significant and unavoidable. Mitigation measures are included in the RDEIR to limit the number of evenings the lights would be used, but the impact remains significant and unavoidable.

**Bat Flight Paths.** Special-status species bats are required to be addressed in CEQA documents; their roosting activity is protected by the California Department of Fish and Wildlife, who commented on the RDEIR, but did not raise an issue regarding bats. Please refer to Letter 131. According to Section 7.0, Biological Resources, roosting bats do have the potential to be affected by construction of the project and mitigation measures are presented to reduce this potential, significant impact, to a less-than-significant level (see pages 7-27 through 7-32 of the RDEIR). No changes to the RDEIR are necessary.

**Studies Regarding Plants Maturing in Dark Night Sky.** The commenter presents no citation or examples of the scientific literature they are referencing.

In general, trees produce food during the day (photosynthesis) and consume food/water during the night. Some trees droop at night, which people call “sleeping.” Higher rates of growth tend to happen after midnight, long after the stadium and pool lights would be turn off. According to a recent study, “...trees grow mainly at night, with a peak after midnight, when the vapour pressure deficit (VPD) is among the lowest.” (Zweifel, R., et. Al. 2021. *Why trees grow at night*. New Phytologist, 231(6), 2174-2185. Available online at: <https://nph.onlinelibrary.wiley.com/doi/epdf/10.1111/nph.17552>). No changes to the RDEIR are necessary.

**Adverse Biological Impacts.** Biological resource impacts are addressed in Section 7.0, Biological Resources, of the RDEIR.

**Assessment of Impacts on Community.** Impacts associated with the proposed stadium lights are addressed throughout the RDEIR.

**Marine Layer/Light Dome Effect.** See response to comment 2 (under “Atmospheric Conditions”) for Letter 2b.

**Cumulative Impacts of both Pool and Stadium Lights.** Cumulative lighting effects, including when both the pool and proposed stadium lights are turned on, are addressed in Section 15.0, Cumulative Impacts, of the RDEIR (see “Light and Glare” cumulative analysis on page 15-8).

**Computer Modeling.** The commenter addresses the computer modeling results used for Figure 5-2, Viewshed Analysis Map. A methodology description for how this figure was generated is included on page 5-16 as well as Appendix F of the RDEIR. The visual analysis figure is simply meant to convey the potential areas surrounding the project site where the proposed stadium lights may be seen based on several factors using design parameters and data provided by the light manufacturer.

**Change Color of Lighting as Mitigation.** The color of the lights would be that which is recommended by the Illuminating Engineers Society and Musco, the lighting designer. Please also see response to Letter 5, comment 3.

**NOP Comment.** The commenter notes a NOP comment received on the original DEIR that suggests lens and glare shields be utilized to prevent light spill over. The commenter questions why this suggestion could not be implemented as a mitigation measure. As



presented in Section 5.0, Aesthetics, of the RDEIR, light spill would not occur beyond the campus boundaries. Therefore, no impact would occur beyond the campus boundary and no mitigation measure addressing this issue is necessary.

No changes to the RDEIR are required.

3. The commenter presents a series of comments on the issue of “Transportation.” Each of these separate comments is addressed further below:

**Emergency Access Routes.** Regarding emergency access routes, ingress and egress, as well as internal circulation, for everyday or for emergencies is presented in Figure 4-1, Overall Site Plan, and Figure 4-6, Post Development Overall Parking Exhibit, of the RDEIR. See also response to letter 14-2-f. In addition, with implementation of Mitigation Measure 11-4, parking during the most highly attended events would not result in a significant environmental impact or emergency access issues.

**Persons Per Car Estimate.** See Section 11.0, Transportation and Parking (page 11-8 through 11-12), regarding trip generation and the persons per vehicle methodology, as well as response to comment 1 for Letter 14-3-j, for an explanation as to how the numbers were derived.

**Walk or Bike to Stadium Events.** Regarding walking and biking to campus, see response to Letter 14-1-k, response to Letter 14-5-d, comment 2, and response to Letter 14-1-q, comment 2.

**Event No Parking signage.** The “No Event Parking” signage would apply to only those visitors to the high school who want to park in the neighborhood.

**TMP and Parking West of State Route 1.** See response to comment 3 (under “Traffic and Parking”) for Letter 2b, which addresses the perceived issue of parking west of State Route 1.

**TMP and Existing Traffic and Parking at High School.** The purpose of the Traffic Management Plan is to address parking and circulation issues at the high school during highly-attended events. Additionally, Hexagon Transportation Consultants (RDEIR Appendix J) reviewed the vicinity and on-campus access and circulation and concluded that with implementation of the Traffic Management Plan, traffic operations at highly attended events would work acceptably. Any perceived safety impacts would be mitigated by implementation of the Traffic Management Plan. Regarding traffic and parking issues at the beginning and ending of school days, the proposed project includes an additional 111 on-campus parking spaces.

**Pros and Cons of Tennis Court Replacement.** The RDEIR, the site access and parking evaluation (RDEIR Appendix J), and the Traffic Management Plan are not required to provide a pro and con analysis of replacing the tennis courts with a parking lot. (See *San Francisco Ecology Ctr. v. City & County of San Francisco* (1975) 48 Cal. App. 3d 584, 595.) All three evaluate either the environmental and/or traffic and circulation impacts of the proposed project which includes replacement of the tennis courts with a new parking lot.

No changes to the RDEIR are required.

4. The commenter critiques the assessment of scenic impacts to State Route 1. There are no proposed changes within scenic State Route 1 as part of the proposed project. The RDEIR does evaluate the visual impacts of the project when viewed from State Route 1. See Section 5.0, Aesthetics, in the RDEIR for a detailed methodology, 17 color visual simulations (which include locations from State Route 1), a detailed analysis of the visual impacts of the project, and mitigation measures to limit the hours and number of evenings of impacts. See also responses to comment 27 of Letter 11b, and comment 1 of Letter 14-2-y. No changes to the RDEIR are required.
5. The commenter states the RDEIR noise analysis fails to address noise increases associated with practices and traffic associated with practices. Football games, and associated traffic, were used for the noise analysis as they are the highest attended games at the high school. Therefore, the noise analysis used the “worst-case” scenario and concluded that the impact would not be significant. Therefore, if the worst-case scenario is not significant, then all of the other events, including practices, would not be significant. For further discussion, see page 10-10 of the RDEIR. See also response to Letter 58b. No changes to the RDEIR are required.
6. The commenter questions the adequacy of mitigation identified to address potential impacts to trees along State Route 1. See response to comment 4 (under “Protected Trees”) for Letter 2b. The trees do not provide a noise buffer. See response to Letter 58b, comment 14.
7. The commenter states the RDEIR does not address impacts from increased water run-off. See Section 12.0, Soils, Erosion, and Water Quality, of the RDEIR for discussion of project impacts associated with water quality and other drainage related issues. Project impacts associated with soil erosion and surface water quality were determined to be less than significant with implementation of applicable statewide National Pollution Discharge Elimination System (NPDES) General Permit for Discharge of Stormwater Associated with Construction Activity (Construction General Permit). The school district is required to comply with the Post Construction Stormwater Management Requirements for Development Projects in the Central Coast Region, Central Coast Regional Water Quality Control Board (CRWQCB) Resolution No. R3-2013-0032. This requirement will be

addressed by putting flow-through tree box filters in the new parking lots, as presented in Figure 4-8, East Parking Lot – Conceptual Design. The box filters would be used in both new parking lots. No changes to the RDEIR are required.

8. The commenter addresses project objective 11 (“Create a new, healthy weekend social opportunity for District students while building school spirit”) and whether one can quantify this objective in order to support a statement of overriding considerations. CEQA Guidelines section 15093(b) provides: “When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.” Projective objectives, and whether the project or any considered alternatives are consistent with those objectives, are just one of many factors included in the consideration of approval and adoption of a statement of overriding considerations. Quantification of school spirit increase is not required in order to support adoption of a statement of overriding considerations. Please also refer to response to Letter 14-2-d. No changes to the RDEIR are required.
9. The commenter states the alternatives considered in the RDEIR are too narrow and suggests his own alternative, which includes some of the proposed project components, as well as additional components, while providing further questions on evaluating alternatives in the RDEIR. See responses to comment 24 (under “Objective and Creative Assessment of Alternatives”) and comment 3 for Letter 114c for a discussion of consideration of alternatives by the school district.

For clarification the project site and surrounding neighborhoods are located in unincorporated Monterey County (not the City of Carmel-by-the-Sea). Therefore, no regulations or ordinances governing lighting in Carmel-by-the-Sea apply to the project site and surrounding neighborhoods.

See response to comment 8 above addressing the project objective regarding school spirit.

Regarding a permanent “No Parking, Residents Only” plan, please refer to response to comment 5 of Letter 5.

Alternative 4 – Alternate Location (New, Lighted Stadium at Carmel Middle School) for Practices and Games, presents the alternative whereby new lighted stadium would be constructed at the middle school site. Evaluating moving the entire high school to the middle school site is not required to be evaluated as part of the RDEIR. Such an alternative is unrealistic and infeasible and the commenter has not provided justification or evidence for

why this alternative should be considered. Among the reasons such a move would not be feasible for the school district are financial costs and spatial needs at both schools. During the planning phases of the 2019 Facilities Master Plan, it was estimated that moving the high school to the middle school site would cost upwards of \$300 million to the school district. In addition, high school and middle school spatial and loading needs are vastly different. Among other spatial differences between the two schools, the middle school site would require a significant increase in the number of classroom and support facilities which the middle school site does not have currently, including but not limited to a new pool, performing arts center, auto shop, video/audio/digital art classroom, weight room, sports medicine room, Advanced Placement (AP) science classrooms, library and associated college and career center, and photography classrooms. The middle school site would also require likely hundreds of additional parking spaces.

Additionally, physically modifying the middle school to a high school would require closing the middle school and there is nowhere to house the students during this likely two-year process.

Finally, the environmental impacts of redeveloping the middle school into a high school would result in more impacts than would the proposed project. Section 18.0, Alternatives, under the environmental analysis for “Alternative 4: Alternative Location,” evaluates an alternative of developing just a lighted stadium at the middle school, and because of the sensitive habitat associated with the adjacent Carmel River, as well as the sensitive cultural resources in the immediate vicinity, the environmental impacts were determined to be greater. Redeveloping the middle school as a high school would therefore, result in even greater impacts.

As previously noted, Section 15126.6 of the CEQA Guidelines states that “An EIR need not consider every conceivable alternative to the project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible... There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.” Likewise, CEQA does not require that an agency consider alternatives to a component of a project, and should instead focus on alternatives to the project as a whole (*Calif. Native Plant Soc’y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 993.)

No changes to the RDEIR are required.

**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding **your** Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!

**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - *Updating required school area warning signage*
  - *Consider posted speed reductions down to 15 MPH in school areas*
  - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
  - *Exploring additional stop sign controls at intersection*
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.



1  
con't.

**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Jennifer Bradley

DATE: October 1<sup>st</sup> 2022

CONTACT INFORMATION: 925 487 0570

## Response to Letter 133, Jennifer Bradley

1. See responses to Letter 2c.

**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

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Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Jana Brinsmead 

DATE: 9/28/22

CONTACT INFORMATION: 3451 Taylor Rd  
Carmel, CA 93923

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## Response to Letter 134, Jana Brinsmead

1. See responses to Letter 2c.



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NAME: Jeanette D. Campbell

DATE: 9/30/2022

CONTACT INFORMATION: e-mail nellieec1234@yahoo.com

nellieec1234@yahoo.com

## Response to Letter 135, Jeannette Campbell

1. See responses to Letter 2c.



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  - Address the root cause of the delay and purchase more buses and hiring more drivers.
  - Other school districts like MPUSD have adopted the law with no lights - we should be able to as well.
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  - Install LED filters and use the lights as little as possible. Keep your promise from December 2021.

P.S. To School Board Members: Sara Hinds, Karl Pallastrini, Tess Arthur, Anne Marie Rosen, Seaberry Nachbar  
• Help shut down this plan due to pollution, safety and the impact on our community.

NAME: MARGARET CANTWELL *Margaret Cantwell*  
DATE: Oct 3, 2022  
CONTACT INFORMATION: (707) 483-5200  
*Apolloshands@gmail.com*

## Response to Letter 136, Margaret Cantwell

1. See response to comment 1 to Letter 2c.
2. See response to comment 3 to Letter 2c, comment 16 to Letter 11b, comment 1 to Letter 14-1-u, comment 1 to Letter 14-4-a, and comment 2 to Letter 14-2-c.
3. See response to comment 4 to Letter 2c.
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Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Eric Mueller & Elizabeth Mueller

DATE: 9/26/22

CONTACT INFORMATION: 9499540676 / 9494689689

## Response to Letter 137, Eric & Elizabeth Mueller

1. See responses to Letter 2c.

Dear Superintendent Ted Knight,

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  - Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth!
  - Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
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  - The 18-foot roadway, new parking lots and viewing platform don't provide enough details.
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  - CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
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  - Address the root cause of the delay and purchase more buses and hiring more drivers.
  - Other school districts like MPUSD have adopted the law with no lights - we should be able to as well.
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P.S. To School Board Members: Sara Hinds, Karl Pallastrini, Tess Arthur, Anne Marie Rosen, Seaberry Nachbar

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NAME: D. POET  
DATE: 3 OCTOBER 2022  
CONTACT INFORMATION:  
175 CORONA RD  
CARMEL 93923

## Response to Letter 138, D. Poet

1. See response to comment 1 to Letter 2c.
2. See response to comment 3 to Letter 2c, comment 16 to Letter 11b, comment 1 to Letter 14-1-u, comment 1 to Letter 14-4-a, and comment 2 to Letter 14-2-c.
3. See response to comment 4 to Letter 2c.
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NAME: *SHERRI REID*  
DATE: *10-1-22*  
CONTACT INFORMATION: *76 DEL MESA CARMEL*  
*CARMEL, CA 93921*

## Response to Letter 139, Sherri Reid

1. See response to comment 1 to Letter 2c.
2. See responses to comment 3 to Letter 2c, comment 16 to Letter 11b, comment 1 to Letter 14-1-u, comment 1 to Letter 14-4-a, and comment 2 to Letter 14-2-c.
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**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

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 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

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**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

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Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: *Louis Roberts* LOUIS ROBERTS

DATE: 9-30-22

CONTACT INFORMATION: LOUISOROBERTS@PACBELL,  
NET

## Response to Letter 140, Louis Roberts

1. See responses to Letter 2c.



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Seaberry Nachbar	snachbar@carmelunified.org

NAME:

NANCY RAWLS ROBERTS



DATE:

10/1/2022

CONTACT INFORMATION:

NANCY RAWLS R @ GMAIL .COM

## Response to Letter 141a, Nancy Rawls Roberts

1. See responses to Letter 2c.

From: **Nancy Rawls Roberts** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sun, Oct 9, 2022 at 6:31 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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con't.

## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from from the Carmel Views neighborhood.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr on 12/7/2021 at 5:48pm:

[https://drive.google.com/file/d/1mOqyqkOWRp60fDM\\_IrzgQMFtarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyqkOWRp60fDM_IrzgQMFtarGEWSS2/view?usp=sharing)

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<https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:



- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County’s noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

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C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylii*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments

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(Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light poles will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Nancy Rawls Roberts

[nancyrawlsr@gmail.com](mailto:nancyrawlsr@gmail.com)

25566 shafter way

Carmel, California 93923

## Response to Letter 141b, Nancy Rawls Roberts

1. See response to Letter 2b.



**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
 Attn: Dan Paul, Chief Operations Officer  
 4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding your Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - *Updating required school area warning signage*
  - *Consider posted speed reductions down to 15 MPH in school areas*
  - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
  - *Exploring additional stop sign controls at intersection*
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.

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**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: KR SAWYER 25118 CANYON DR, CARMEL CA

DATE: 9/30/22

CONTACT INFORMATION: KSAWRH@GMAIL.COM

## Response to Letter 142, K.R. Sawyer

1. See responses to Letter 2c.



Jan Stone  
 25633 Meuse Dr.  
 Camel, Ca. 93923  
 Sept. 27, 2022

Camel Unified School Dist.  
 4380 Camel Valley Road  
 Camel, Ca. 93923  
 ATTN: Dan Paul Chief Oper. Off.

Dear Mr. Paul

I have lived in my Comstock Post Adobe home for 20 years in this beautiful quiet neighborhood near the High School.

I totally oppose the construction of the Stadium lights and all the other disruptions that have been added on in the proposal. A parking lot to replace the tennis courts is a terrible idea and would increase traffic and safety on our street, Meuse Dr. Our street is narrow and dark. It would be very unsafe.

The lights will have an adverse effect on the vista from the school and affect many homes all around my neighborhood and many other homes. Our property values will be effected and our peaceful neighborhood will never be the same. Please do not do this. It is not necessary. Do you and the Board members live in the neighborhoods that will be affected, will you suffer from it? Or do you live far away in another neighborhood. Thank you for your  
 Jan Stone  
 831 521-0423

## Response to Letter 143a, Jan Stine

1. The commenter expresses their opposition to the proposed project and their concerns regarding increased traffic and safety issues on Morse Drive, which the comment states is narrow and dark. The proposed project includes 111 new on-campus parking spaces in order to alleviate parking in the neighborhoods. Traffic and safety issues are addressed in Section 11.0, Transportation and Parking, of the RDEIR.
2. The commenter states that the stadium lights will have an adverse effect on the vista from the school and affect many homes in adjacent neighborhoods in terms of property value. Environmental effects associated with scenic vistas and scenic resources are addressed in Section 5.0, Aesthetics, of the RDEIR. Alleged effects on residential property value is not an environmental issue. Such alleged economic and social effects are not related to a physical change. (CEQA Guidelines, §§15151(a) & 15358(b).) Moreover, the commenter does not provide any substantiating evidence that the project may have economic and social impacts. Please also see response to Letter 103a. Therefore, no response is necessary.

No changes to the RDEIR are required.

From: **Jan Stine** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sat, Oct 8, 2022 at 8:25 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County’s noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

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C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

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B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylii*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments

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(Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light poles will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Jan Stine

[janstine2007@comcast.net](mailto:janstine2007@comcast.net)

25633 Morse dr

Carmel, California 93923

## Response to Letter 143b, Jan Stine

1. See responses to Letter 2b.



**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

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- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

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  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

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- BUT the truth is on page 103 with up to 400 practices and 124 games.
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- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
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**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

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**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Megan Terry

DATE: 9.30.22

CONTACT INFORMATION: 831-624-5982

## Response to Letter 144, Megan Terry

1. See responses to Letter 2c.



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**VIA: feedback@carmelunified.org**

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Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Paul Torment,

DATE: Oct. 1, 2022

CONTACT INFORMATION: 831-574-3254

## Response to Letter 145, Paul Pomands

1. See responses to Letter 2c.

From: **Marguerite Meyer** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Thu, Oct 6, 2022 at 9:39 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
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Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

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[https://drive.google.com/file/d/1mOqqykOWRp60fDM\\_IrzigQMFtarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqykOWRp60fDM_IrzigQMFtarGEWSS2/view?usp=sharing)

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the

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scenic vistas and visual character of Carmel:

- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

- i. Lights recommendations for Wellesley HS:

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expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

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<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not



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perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light poles will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Marguerite Meyer

[marguer@pacbell.net](mailto:marguer@pacbell.net)

2305 Bayview Ave

Carmel By the Sea, California 93923

## Response to Letter 146, Marguerite Meyer

1. See responses to Letter 2b.

From: **Audrey Morris** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Thu, Oct 6, 2022 at 4:11 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
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Audrey Morris

[yerduamz@gmail.com](mailto:yerduamz@gmail.com)

5630 Carmel Valley Rd

Carmel, California 93923

## Response to Letter 147a, Audrey Morris

1. See responses to Letter 2b.



Dear Superintendent Ted Knight,

We have serious concerns regarding your Environmental Impact Report. You are required to respond.

- 1 **Show us the full impact of the light pollution on our treasured views and night skies.**
  - Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth!
  - Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- 2 **Stop surprises, the RDEIR includes significant NEW expanded construction projects.**
  - Re-start community engagement with a legally required Scoping Session.
  - The 18-foot roadway, new parking lots and viewing platform don't provide enough details.
- 3 **Inspire our future with long-term solutions versus short-term band-aids. Properly assess CMS potential.**
  - CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
  - CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
- 4 **Prioritize implementing "Late Start", a CA State Law benefiting ALL students.**
  - Address the root cause of the delay and purchase more buses and hiring more drivers.
  - Other school districts like MPUSD have adopted the law with no lights - we should be able to as well.
- 5 **Fix the light pollution emitting from the pool lights you installed without a legal process.**
  - Install LED filters and use the lights as little as possible. Keep your promise from December 2021.

P.S. To School Board Members: Sara Hinds, Karl Pallastrini, Tess Arthur, Anne Marie Rosen, Seaberry Nachbar

NAME: Audrey F. Moran's (s) Audrey F. Moran's  
 DATE: OCT. 4, 2022  
 CONTACT INFORMATION: yerduanz@gmail.com

## Response to Letter 147b, Audrey Morris

1. See response to comment 1 to Letter 2c.
2. See responses to comment 3 to Letter 2c, comment 16 to Letter 11b, comment 1 to Letter 14-1-u, comment 1 to Letter 14-4-a, and comment 2 to Letter 14-2-c.
3. See response to comment 4 to Letter 2c.
4. See response to comment 10 to Letter 2c.
5. See response to comment 15 to Letter 2c.



From: **Chris Allen** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Thu, Oct 6, 2022 at 4:16 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqyqkOWRp60fDM\\_IrzigQMFarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyqkOWRp60fDM_IrzigQMFarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the

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scenic vistas and visual character of Carmel:

- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

- i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

- i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

- ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely

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expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not

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perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwitAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmljXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Chris Allen

[callen636@comcast.net](mailto:callen636@comcast.net)

Carmel, California 93923



## Response to Letter 148, Chris Allen

1. See responses to Letter 2b.

We have serious concerns regarding your Environmental Impact Report. You are required to respond.

- 1 **Show us the full impact of the light pollution on our treasured views and night skies.**
  - Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth!
  - Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- 2 **Stop surprises, the RDEIR includes significant NEW expanded construction projects.**
  - Re-start community engagement with a legally required Scoping Session.
  - The 18-foot roadway, new parking lots and viewing platform don't provide enough details.
- 3 **Inspire our future with long-term solutions versus short-term band-aids. Properly assess CMS potential.**
  - CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
  - CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
- 4 **Prioritize implementing "Late Start", a CA State Law benefiting ALL students.**
  - Address the root cause of the delay and purchase more buses and hiring more drivers.
  - Other school districts like MPUSD have adopted the law with no lights - we should be able to as well.
- 5 **Fix the light pollution emitting from the pool lights you installed without a legal process.**
  - Install LED filters and use the lights as little as possible. Keep your promise from December 2021.

**P.S. To School Board Members:** Sara Hinds, Karl Pallastrini, Tess Arthur, Anne Marie Rosen, Seaberry Nachbar

- Help shut down this plan due to pollution, safety and the impact on our community.

NAME: BARBARA SMITH

DATE: 10/07/2022

CONTACT INFORMATION:

bjsmithcarmel



Dr. Barbara J. Smith  
25476 Flanders Dr.  
Carmel, CA 93923

@mac.com

## Response to Letter 149, Barbara Smith

1. See response to comment 1 to Letter 2c.
2. See responses to comment 3 to Letter 2c, comment 16 to Letter 11b, comment 1 to Letter 14-1-u, comment 1 to Letter 14-4-a, and comment 2 to Letter 14-2-c.
3. See response to comment 4 to Letter 2c.
4. See response to comment 10 to Letter 2c.
5. See response to comment 15 to Letter 2c.

From: **Marjorie Longo** <[frumml@gmail.com](mailto:frumml@gmail.com)>  
Date: Thu, Oct 6, 2022 at 5:46 PM  
Subject: Fwd: Stadium Lights  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

- 1 **Because Friday Night Football was the original reason for, and seems to be the driving force behind the lights, we might ask what is happening to High School Football in the United States and specifically California. Both Pop Warner and High School football have been declining for the last seven years. The long term physical effects of this contact sport are evident. Many parents and students have moved away from football to other, less dangerous sports.**
  
- 2 **Erecting four towers, each nearly double the height of the tallest building in the community, with 44 intensely bright lights reflecting off of the field, as well as up lights that will be visible and offensive to much of the community and visitors,**

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**will not change the fact that Pop Warner and High School football are in decline. Spending millions of dollars on lights and a sound system will not change that fact, nor will it change the unmitigatable “significant” negative aesthetics of the lights and towers on the community. The towers and lights will forever be unsightly in a community that treasures it’s beauty.**

3

**Viewshed analysis map 5-2 shows just some of the vast area of the community that will be significantly impacted. The EIR offers no real mitigation for the aesthetics. The tall tower and lights will forever be an ugly addition to a community that treasures its culture and its beauty.**

4

**There is a uniqueness to the experience of living and going to school in the Carmel area. Saturday afternoon games, with that view, are a well known tradition, with attendees scrambling to get the view seats. No place in the world has a High School Stadium with a view like Carmel High School.**

**Perhaps more tax dollars should be spent encouraging the students to embrace the uniqueness of their location, appreciate the**

**beauty, and learn ways to help preserve what Mother Nature has gifted them, even if it is a bit inconvenient at times.**

**Light pollution has become a worldwide problem with entire countries, states and communities dedicated to taking back the night for the sake of a healthier planet and healthier inhabitants. Rather than adding to the problem, and more specifically causing a major local light pollution problem, perhaps the students and the community would be better served if more time and money was spent teaching about the degradation of the environment caused by all pollution including light pollution. Now the District has an opportunity to step up and be part of the solution.**

**Tall towers, bright lights, and enhanced sound systems are not in keeping with the culture nor the natural beauty of the community. I ask the School Board to step up and do the right thing for the students of the future, the community of the future and the future of the environment. Surely there is a greater need in the District for millions of dollars.**

**The primary sport is in decline. There is known harm to the community caused by future traffic issues, safety issues, and parking issues, as well as health issues, light pollution and land use**



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**issues. There has to be a better solution.  
Please vote no on the stadium lights.**

**Marjorie Longo**

## Response to Letter 150, Marjorie Longo

1. The commenter states that “Friday Night Football” is the original reason for and driving force for the lights and that football is a declining sport. High school football in the United States and elsewhere in California is not the subject of the RDEIR. Regarding project objectives, see the RDEIR, Section 4.0, Project Description, pages 4-1 and 4-2. No environmental issues are raised. Therefore, no response is necessary.
2. The commenter expresses their concerns regarding the stadium lights and spending millions on lights and a sound system. To clarify, no new public address or sound system is proposed as part of the project. Please see Section 4.0, Project Description, and Section 10.0, Noise, of the RDEIR. Lighting impacts are addressed in Section 5.0, Aesthetics, of the RDEIR.
3. The commenter notes that Figure 5-2 shows the visual impact area of the project and that the RDEIR offers no mitigation for aesthetic impacts. As presented in Section 5.0, Aesthetics, of the RDEIR, mitigation measures (5-2a, 5-2b, 5-3c, and 5-2d) are presented to reduce the visual impacts of the proposed project. The RDEIR acknowledges that even with implementation of these mitigation measures, the proposed project would result in a significant and unavoidable impact associated with light pollution and new sources of light and glare. Please refer to Section 5.0, Aesthetics, of the RDEIR for further discussion.
4. The commenter expresses their concern for light pollution as a result of the proposed project. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR. The commenter also notes that the project would result in traffic issues, safety issues, and parking issues, all of which are addressed in Section 11.0, Transportation and Parking, of the RDEIR. The commenter states the project would result in “health issues” but does not describe what specific health issues they are concerned with. Impacts associated with air quality impacts, including short-term construction emissions and potential impacts to human health, are addressed in Section 6.0, Air Quality, of the RDEIR. Regarding lighting impacts on humans, see response to comment 3 of Letter 5.

No changes to the RDEIR are required.

October 6, 2022

From: Mark and Jo Ann Holbrook  
26402 Birch Place, Carmel, CA 93923  
831-624-1132

1 To the Board Members of the Carmel Unified School District, students, and faculty,

The words of gratitude in this dedication below are from my mother’s 1941 Carmel High School yearbook. They tell a story about how coming together and working together have served the school district and community well for the last 82 years. May we rekindle the relationship and continue on.

*Dedication*

*To the people of Carmel, whose farsightedness and generosity have given us Carmel High School, we dedicate our first yearbook.*

*May this record of our activities reflect some of the pride we feel in this hilltop school, fashioned from the stone and soil of Carmel, and whose spacious windows frame the Carmel Valley and the rising Santa Lucia mountains.*

*Our appreciation is unbounded for all who have helped to create this school. We wish it were possible to express our gratitude to each one by name.*

*Thank you, Carmel!*

First, let me say that my wife Jo Ann and I are not categorically against lights on the football field or pool area. However, we are not in favor of the long-term negative effects these changes will have on the immediate area, as well as on the entire mouth of the Carmel Valley:

- Light pollution
- Noise
- Traffic, both vehicle and foot
- Trespass
- Increased litter
- .....and more

It seems to us and others with whom we have talked that the Board Members, Superintendent, School Principal, and others think that these “improvements” will be a great benefit for the school and students and for the people living within the district. This may be true, but you are not asking all of the people you feel will benefit from this “modernization” of our high school to participate in paying the price for these “improvements”. You are asking, no, you are demanding payment, continuing and on-going payment, without compensation, solely from the residents, both human and those in nature, of the immediate and close area surrounding the school.

Shouldn’t all residents and property owners within the district share equally, (or as close as possible), in all the costs?

We think it is indisputable that those who own property in the affected area near the school will stand to lose tens if not hundreds of thousands of dollars in the value of their homes.

2

## **Work Has Been Done!**

With the changes that the district has proposed with the addition of an internal access road, and more on-site parking, etc., there will be less intrusion of vehicles and people, less noise from vehicles and people, less trespass, litter, etc. into the surrounding neighborhoods. This is good, a step in the right direction. But it does not stop the light pollution or noise from the games themselves. We live a mile away and currently can hear the day games in our home. What will it be like in the quiet of the night?

3

## **A Quick Note to the Board...**

In a conversation with a representative of the International Dark-Sky Association, if plans are certified as meeting the requirements for Dark-Sky Certification your certification would only apply to a sky with zero percent humidity. How often do we see a reading of 0 humidity?

If the football field were to be lowered to between 10-20 feet, and an indoor stadium built, lighting inside the stadium would be much more efficient, (and lower cost), and the noise and light invading the surrounding community would be virtually eliminated. The facility could be used on a more regular basis without the greater disruption to the local community.

4

## **Propose a Bond Measure!**

If you were to propose a bond measure to build such an indoor facility the greater community would have, through their vote, a way to express their commitment to the all-around education of our dear ones, and to the environment we all share. We do not believe we will get a second chance.

We will vote YES if such a bond measure were to come before us. We were both born just north of CHS over 70 years ago. We were raised here and we have in our combined families 14 CHS graduates between 1945 through 2005.

In honor of our families we would like to propose, that if you embrace and build an indoor stadium, that you offer people the opportunity to participate by helping fund it. For each \$1,000 donation (?) to go towards the construction fund the donor may place a small name plate on the arm or back of a stadium seat. Let us tell you now we will take 8 of them on the 50 yard line!

Thank you,

Mark and Jo Ann Holbrook

## Response to Letter 151, Mark & Jo Ann Holbrook

1. The commenters express their concerns regarding light pollution, noise, traffic (both vehicle and foot), trespassing, and increased litter as a result of the proposed project. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR. Noise impacts are addressed in Section 10.0, Noise, of the RDEIR. Traffic impacts are addressed in Section 11.0, Transportation and Parking, of the RDEIR. Trespassing and litter are not environmental issues nor within the scope of the CEQA process, and therefore, no response is necessary. The commenters also note their concerns over who will bear the “cost” of the improvements being shared equally across the district and loss of property value of residences surrounding the project site. Neither is an environmental issue and therefore, no response is necessary. Please also see response to Letter 103a.
2. The commenters note their appreciation for certain project changes, including the internal access road and more on-site parking, but reiterate their concerns regarding light pollution and noise. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR. Noise impacts are addressed in Section 10.0, Noise, of the RDEIR.
3. The commenters note a conversation with an International Dark-Sky Association representative where that representative noted a requirement for “zero-percent humidity” in order to receive “Dark-Sky Certification.” The school district’s IDA representative stated that there is no humidity reading requirement for “Dark-Sky Certification.”

The commenters also suggest lowering the existing field and constructing an indoor stadium. Based upon the topographic and structural constraints in the immediate vicinity of the track and field (internal loop road, buildings, tennis courts/parking lot), constructing an indoor stadium at this location is not feasible. Refer to any of the figures in the RDEIR with aerial photographs and a description of baseline conditions in Section 3.0, Environmental Setting, of the RDEIR. Moreover, the commenter does not identify any evidence that their proposed alternative is necessary to informed decision-making or is either feasible or environmentally superior to alternatives studied in the RDEIR. Please refer to Section 18.0, Alternatives, of the RDEIR. See also response to comment 2 to Letter 12b.

4. The commenters suggest a bond measure and fundraising be proposed to fund their indoor stadium idea. No environmental issues are raised and therefore, no response is necessary.

From: **Paola Berthoin** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Fri, Oct 7, 2022 at 8:26 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1 | The more I learn about the proposed stadium lights project and all that it entails, I question why it is still being proposed. So many undesirable impacts to the neighbors, scenic Carmel, environmental concerns, traffic, cutting down the cypress for more parking, climate change impacts, loss of dark skies at night and how that affects migrating birds and night flying pollinators...

2 | Reading the Carmel Unified School District (CUSD) Mission:  
"The Carmel Unified School District community produces lifelong learners who are prepared for the challenges of higher education, the workplace, and their role as citizens of an ever-changing global community."

and some of the beliefs that guide the Board:

"We believe ...  
in lifelong learning;  
we have responsibility for the environment;  
everyone deserves respect;  
we are responsible for our actions;  
in the importance of moral and ethical standards;  
living by example is the best expression of one's beliefs;  
in the importance of creativity and innovation";

This stadium light project does not match the guiding Mission and Beliefs.

Please vote no on this project. Surely there is another way to address concerns that employ creativity and innovation for student success.



3

In addition:

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here:

1. Many of the objectives of the project are worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Again, this stadium light project does not match the guiding Mission and Beliefs of CUSD.

Please vote no on this project. Surely there is another way to address concerns that employ creativity and innovation for student success.

Sincerely,

Paola Berthoin

Paola Berthoin

[valentine1661@yahoo.com](mailto:valentine1661@yahoo.com)

25440 Telarana Way

Carmel, California 93923

## Response to Letter 152a, Paola Berthoin

1. The commenter expresses their opposition to the proposed project and specifically their concerns with impacts to neighbors, scenic Carmel, environmental concerns, traffic, cutting down Monterey cypress trees, climate change impacts, loss of dark skies, and effects to migrating birds and night flying pollinators. Scenic vista impacts are addressed in Section 5.0, Aesthetics, of the RDEIR. Traffic impacts are addressed in Section 11.0, Transportation and Parking, of the RDEIR. For clarification, no tree removal is planned as part of the proposed project; although the potential for tree removal as a result of the proposed project is addressed in Section 7.0, Biological Resources, of the RDEIR. The RDEIR evaluates the potential for trees to be damaged or removed, although none are proposed for removal. Light pollution and impacts to the night sky are addressed in Section 5.0, Aesthetics, of the RDEIR. Regarding impacts to wildlife species, please refer to Section 7.0, Biological Resources, and Section 18.0, Alternatives, for a discussion of potential impacts to wildlife species. According to Section 7.0, Biological Resources, nesting birds and roosting bats do have the potential to be affected by construction of the project and mitigation measures are presented to reduce this potential significant impact to a less-than-significant level (see pages 7-27 through 7-32). No changes to the RDEIR are required.
2. Comment noted. This comment does not specifically address the RDEIR. No environmental issues are raised. Therefore, no response is necessary. A decision on the project's merits will be made by the Board, who will consider all comments.
3. See response to Letter 2b.

Dear Superintendent Ted Knight,

We have serious concerns regarding your Environmental Impact Report. You are required to respond.

- 1 | 1 **Show us the full impact of the light pollution on our treasured views and night skies.**
  - Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth!
  - Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- 2 | 2 **Stop surprises, the RDEIR includes significant NEW expanded construction projects.**
  - Re-start community engagement with a legally required Scoping Session.
  - The 18-foot roadway, new parking lots and viewing platform don't provide enough details.
- 3 | 3 **Inspire our future with long term solutions versus short-term band-aids. Properly assess CMS potential.**
  - CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
  - CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
- 3 | 4 **Prioritize implementing "Late Start", a CA State Law benefiting ALL students.**
  - Address the root cause of the delay and purchase more buses and hiring more drivers.
  - Other school districts like MPUSD have adopted the law with no lights - we should be able to as well.
- 4 | 5 **Fix the light pollution emitting from the pool lights you installed without a legal process.**
  - Install LED filters and use the lights as little as possible. Keep your promise from December 2021.

P.S. To School Board Members: Sara Hinds, Karl Pallastrini, Tess Arthur, Anne Marie Rosen, Seaberry Nachbar

- Help shut down this plan due to pollution, safety and the impact on our community.

NAME:

Paola Bertolini

DATE:

10-7-22

CONTACT INFORMATION:

25440 Telaraña Way  
Carmel CA 93923

## Response to Letter 152b, Paola Berthoin

1. See response to comment 1 to Letter 2c.
2. See responses to comment 3 to Letter 2c, comment 16 to Letter 11b, comment 1 to Letter 14-1-u, comment 1 to Letter 14-4-a, and comment 2 to Letter 14-2-c.
3. It appears this comment has been crossed out. However, to the extent the commenter intends to submit this comment, please see response to comment 10 to Letter 2c.
4. See response to comment 15 to Letter 2c.

From: **Lucas Blok** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Fri, Oct 7, 2022 at 9:18 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
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## 1. Flaws in the Objectives

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B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the



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- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
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C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

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expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

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E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not

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perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

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a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Lucas Blok

[Kleurmusik@gmail.com](mailto:Kleurmusik@gmail.com)

PO Box 7543

Carmel-by-the-Sea, California 93921

## Response to Letter 153, Lucas Blok

1. See responses to Letter 2b.

From: **Margaret Butterfield** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Fri, Oct 7, 2022 at 10:22 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
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Margaret Butterfield  
[artink2@earthlink.net](mailto:artink2@earthlink.net)

Carmel Valley, California 93924

## Response to Letter 154, Margaret Butterfield

1. See responses to Letter 2b.



From: **Steve Ricks** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Fri, Oct 7, 2022 at 11:09 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

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C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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expected noise levels for games (discussed in item 3A).

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- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
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- i. Photo of cars backed up on SR1:

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B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

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iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmljXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Steve Ricks

[steve.a.ricks@gmail.com](mailto:steve.a.ricks@gmail.com)

25343 Hatton Road

Carmel, California 93923-8233



## Response to Letter 155a, Steve Ricks

1. See responses to Letter 2b.

From: **Steve Ricks** <[steve.a.ricks@gmail.com](mailto:steve.a.ricks@gmail.com)>  
Date: Fri, Oct 7, 2022 at 11:29 AM  
Subject: Stadium Lights and Related "Improvements"  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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My wife and I live on Hatton Road within 200 yards of Carmel High School. This correspondence is offered in opposition to the proposed stadium lights and related infrastructure changes.

As we are near the intersection of Ocean Avenue and Highway 1, we are already quite aware of the traffic that area supports, as well as the noise and congestion that comes with it. We are also aware of the additional parking that occurs within our neighborhood during the school year. While those conditions existed when we purchased our home and moved in, we would have to say that they have been exacerbated over time as the area has grown and traffic increased.

However, the proposed "improvements" were not in the cards when we moved here.

Our principal objections center on the proposed stadium lights and the nighttime activities those lights will afford.

The light pollution alone would be sufficient to justify our opposition, even assuming a usage limited to several night football games. We know that a few night games is not what will occur. There will be night practices and additional "events". There will be additional crowds, noise, traffic, parking and safety issues for us and our neighbors to contend with.

We are not hermits, and a certain amount of noise and inconvenience are part of urban life. But we did not bargain for the proposed changes, and respectfully object to them as they appear to be unnecessary and will degrade the quality of our lives and our enjoyment of the community.

Steve and Allison Ricks  
25343 Hatton Road  
Carmel, CA 93923-8233  
831.293.3099

## Response to Letter 155b, Steve & Allison Ricks

1. The commenters address their opposition to the proposed project and specifically concerns regarding light pollution, noise, traffic, parking and safety issues. Light pollution is addressed in Section 5.0, Aesthetics, of the RDEIR. Noise impacts are addressed in Section 10.0, Noise, of the RDEIR. Parking and safety issues are addressed in Section 11.0, Transportation and Parking, of the RDEIR. No changes to the RDEIR are required.

From: **Donna Manning** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Fri, Oct 7, 2022 at 3:24 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
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Donna Manning

[donna.w.manning@gmail.com](mailto:donna.w.manning@gmail.com)

1820 avenida del mundo, apt 107

Coronado , California 92118

## Response to Letter 156, Donna Manning

1. See response to Letter 2b.

From: **Emily Zefferman** <[ezefferman@gmail.com](mailto:ezefferman@gmail.com)>

Date: Fri, Oct 7, 2022 at 4:14 PM

Subject: Comment on Carmel High School Stadium Improvements Project

To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

To the Carmel Unified School District:

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I am writing to comment on the Draft EIR for the Carmel High School Stadium Improvements Project. I suggest giving greater consideration to the potential impacts of light pollution related to the Project on the sensitive ecosystems and species in the vicinity of the Project. The Carmel area has a unique abundance of protected natural space that provides refuge to many species, many of which are undergoing population declines. I wanted to specifically point out a recent study looking at the impacts of light pollution on an at-risk and iconic species to our area: the monarch butterfly. [This study by Parlin et al.](#), published in *iScience* in May 2022, found that artificial light can disrupt migratory behavior of monarch butterflies, which may have deleterious physiological effects. The Viewshed Analysis Map in the Revised Draft EIR shows Point Lobos as an area where stadium lights may be visible. Point Lobos contains an important overwintering site for monarchs, and monarchs are known to migrate through other light-impacted areas shown in this figure. The Parlin et al. study adds to a growing body of literature on the important effects of light pollution on insects and other organisms.

The monarch butterfly is listed in Table 7-2 as unlikely to occur on the project site, because “Suitable roost trees not found at project site”. While it is true that monarchs are unlikely to roost at the project site, this does not address the possible impacts of light pollution on migrating monarchs or on overwintering monarchs roosting within the range of potential light impacts.

For the final EIR, I encourage a more thorough analysis of the potential effects of light pollution associated with the proposed project on the surrounding ecosystems and at-risk species, including the monarch butterfly, and if and how these impacts may be mitigated.

Thank you for consideration,

Emily Zefferman, PhD Ecologist

## Response to Letter 157, Emily Zefferman

1. The commentor requests additional analysis of impacts from additional lighting on an overwintering monarch butterfly site at Point Lobos. In December 2020, the U.S. Fish and Wildlife Service (USFWS) determined that listing the monarch under the Endangered Species Act is warranted but was precluded at the time by higher priority listing actions. With this finding, the monarch butterfly becomes a candidate for listing; USFWS will review its status each year until they are able to begin developing a proposal to list the monarch. The monarch butterfly is not currently protected under the state or federal Endangered Species Acts; however, candidates for federal listing are considered under CEQA.

Known occurrences of monarch butterfly overwintering habitat are recorded in California Department of Fish and Wildlife (CDFW)'s California Natural Diversity Database. There are no recorded observations of monarch butterfly overwintering habitat at the Carmel High School campus. The record for Point Lobos is located on the north side of the State Reserve approximately three miles southwest of the Carmel High School campus. There are numerous existing light sources between the campus and Point Lobos, including significant residential and commercial and street lighting associated with the commercial shopping centers at the Carmel Rancho Shopping Center, the Barnyard and the Crossroads, residential and commercial areas within the City of Carmel-by-the-Sea, and other residential neighborhoods in unincorporated Monterey County. While it is acknowledged that lighting could impact monarch migratory activity, overwintering habitat is not known to occur at the campus and lighting associated with the City of Carmel-by-the-Sea and surrounding developed areas is already visible at Point Lobos. While the lights may be viewed from various locations in the vicinity, the lights will not shine on ground outside of the campus boundaries. Impacts as result of the project are anticipated to be less than significant and no changes to the RDEIR are recommended. Please refer to further discussion in Section 7.0, Biological Resources, of the RDEIR. Please also refer to response to Letter 72b.

It should also be noted that the CDFW provided a comment letter on this RDEIR. No concerns regarding the proposed project and monarch butterfly were identified in the comments.



From: **sally jewett-brocato** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sat, Oct 8, 2022 at 7:14 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm and Outlook Dr at 6:21pm.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr:

[https://drive.google.com/file/d/1mOqqykOWRp60fDM\\_IrzigQMFarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqykOWRp60fDM_IrzigQMFarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr: <https://drive.google.com/file/d/1UpYMHlQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the

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scenic vistas and visual character of Carmel:

- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

- i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

- i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>
- ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely

expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not

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perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwitAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example,

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there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light poles will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmljXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

sally jewett-brocato

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## Response to Letter 158, Sally Jewett-Brocato

1. See response to Letter 2b.

From: **ConcernedCarmel Residents** <[concernedcarmelresidents@gmail.com](mailto:concernedcarmelresidents@gmail.com)>  
 Date: Sat, Oct 8, 2022 at 7:32 AM  
 Subject: Carmel High School Stadium Improvements SCH# 2021050293  
 To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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This is feedback regarding: Carmel High School Stadium Improvements SCH# 2021050293  
 We are pleased that Carmel Unified School District (CUSD) has significantly extended the CEQA process and timeline to review community responses to gaps and errors found in the first Draft Environment Report (DEIR) named Stadium Lights and prepared in August 2021. However, anticipating the now released Revised Draft Environmental Impact Report (RDEIR), the CUSD Leadership (Superintendent and School Board Members) began waging a misinformation campaign about community members who are concerned about these gaps and errors found in the original DEIR or who sought additional context and information through the legal rights of CPRAs. CUSD's continued language implies community members are either against supporting our students (which we are not) and/or wasting taxpayer when CPRAs should in fact be free to the public without costly and time-consuming legal review.

CUSD's Leadership should instead focus their time, energy and our taxpayer dollars on developing a responsible Revised Draft Environmental Impact Report (RDEIR) that is accurate, transparent and inclusive of all necessary legal information. CUSD's Leadership has not prepared this newly released RDEIR with a sufficient degree of analysis to provide decision-makers with information for taking into account all environmental consequences. In addition, it is apparent that CUSD did not strive to acknowledge or adhere to local policies and regulations to the extent which is feasible.

CUSD may assume concerned Carmel residents will study the details of a voluminous, poorly structured 394+ page report with multiple complex and extraneous appendices to identify the blatant and apparent legal gaps missing from the RDEIR. CUSD Leadership should not underestimate the community's love and commitment to protect the safety of our residents and preserve our environment. We are dedicated citizens willing to do what is right for future generations of Carmel.

Key take-aways from the RDEIR and comments that need to be addressed:

The RDEIR has greatly expanded in an entirely new scope of work that goes well beyond the definition of "stadium improvements" to include the following topics and issues that are NOT centrally relevant or interdependent to the proposed installation of stadium lights. Address:

Why are you increasing the number of parking lots on an already crowded and overgrown high school campus?

Why are you delaying the correction of light pollution from existing pool lights we were promised would be fixed?

Why are you increasing facility storage disguised as a viewing platform with a potentially unsafe design?

Why are you holding hostage the adoption of Late Start to the approval of the stadium lights -- which now has growing opposition. In addition, Late Start is NOT a construction improvement -- thus not part of CEQA. NONE of these issues or topics are interdependent to the proposed installation of stadium lights and should be addressed as separate challenges, opportunities, and solutions. In fact, the RDEIR is ill-named and renaming it as - Stadium Improvements - with the inclusion of the unrelated stadium topics intentionally creates public confusion. The new RDEIR holds key positive outcomes hostage to the approval of the proposed stadium lights. The new scope was not included in the original Scoping Session nor part of the Notice of Preparation.

CUSD's Leadership has botched the growth of the Carmel High School over many years and multiple leadership changes (seven superintendents in seven years). We want to shed light on the true depth of CUSD's continued spend of taxpayers' dollars on projects that will never have viable solutions to the associated chronic problems they've created for the community. The RDEIR not addressed or mitigated the Significant and Unavoidable Environmental Impacts. Carmel High School's activities have continually grown out-of-control within geographical constraints and limited capacity, inside of a limited campus footprint of only 22 acres. These activities have already caused spillover beyond CHS's footprint to its surrounding community, with undesirable impacts on a daily basis.

Mis-managed cover-ups that we'd like answered that are critical to the RDEIR and include several outstanding CPRA requests:

Why was there No CEQA Process or filed Notice of Exemption from 2005-2007 for the construction of the Performing Arts Center and pool construction? (INCLUDE THE EXHIBIT of the unsigned Notice of Exemption

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and Board Solution for the public to see) INCLUDE THE DSA PLANS FOR THE THEATER, POOL AND PREVIOUS STADIUM IMPROVEMENTS.

Why were the Out-of-scope installation of additional pool lights AFTER the funding allocation of the Measure A Bond?

Why don't we have clear insight into CEQA Process or filed Notice of Exemption for the installation of baseball batting cages? If the "swimming pool lights could be included as "stadium improvements" we should include the baseball fields as well. (ALERT: CUSD has not provided responses to several CPRA request that are directly related to stadium lights, athletic fields, pool lights and baseball field/batting cages. A Final EIR shouldn't be approved without completion of all CPRA requests that related to improvements on athletic activities.

The combinations of the above mismanaged projects have created CURRENT significant environmental impacts:

- Serious parking and traffic safety issues surrounding the residential streets of Carmel High School, east, west and north of protected Scenic Highway 1 that are not resolvable

- Significant light pollution emanating from the four facility pool lights mounted on 60-foot-high poles

- Significant noise pollution emanating from the existing baseball batting cages

CURRENT significant environmental impacts have existed and remained unresolved for years despite the community's outcry to the problems CUSD has created. Considering the cumulative effect of the past unlawful and mismanaged projects, their associated serious environmental issues plus the proposed installation of stadium lights for increased nighttime activities – nighttime chaos is about to ensue in the nearby community. The result will be unbridled exacerbation of light/noise pollution, increased traffic and parking and street safety issues completely unchecked in the dark. In addition, the installation of the stadium lights come with destruction of highly sensitive protected environments and degradation of a community's visual character. Address the below questions:

Why is CUSD not immediately correcting the light pollution from existing pool light and instead holding the fixes hostage to the proposed installation of stadium lights? This is a cynical bargaining ploy to get the stadium lights erected. The Superintendent promised this immediate fix in a December 2021 Public Listening Session -- broken promise [\[INSERT the DECEMBER 2021 presentation \(Listening Session\) from the Superintendent regarding stadium lights as an appendix reference\]](#).

Why does CUSD continue with their false narrative that implementation of California school Late Start is connected to the requirements of stadium improvements or installation of proposed stadium lights? In fact, many schools throughout California, including Monterey Peninsula Unified School District (MPUSD), have successfully switched to Late Start without harming their sports or academic programs. Late Start is just another hostage held to get the stadium lights despite the growing objections of the surrounding community. [\[INSERT all documentation, reports and research associated with Late Start that have been generated by CUSD for the past 12 months\]](#)

Why are two new parking areas with an additional 111 parking spaces, including ADA parking, and a new, internal roadway needed as interdependent with the proposed stadium lights? Aren't the same amount of people attending the day games that will be attending the night games? This night attendance factor is still unclear (increase, decrease, same). The merits of any new parking should be examined as standalone project without interdependencies of the proposed stadium lights. [\[INSERT the DSA stamped and approved plans\]](#). This is such a new scope of work. Why did these project not go through Scope Session and Notice of Exemption process?

With CUSD's publicly stated intention to install proposed stadium lights, the community has had enough, and we have been pushed to our limits. The scale of irresponsible growth within a geographically limited high school campus must stop. The 2019 Facilities Master Plan is a failure and needs to be revisited as whole, including the proposals elevating existing CHS buildings to accommodate more growth. Short-term fixes are reckless and ineffective, and the entire RDEIR should be rejected with a "NO" vote.

It is critical to point out the serious environmental Impacts of the proposed stadium lights:

Light Pollution (people/wildlife in a large area, near and far, will see the proposed lights): CUSD RDEIR omits and lacks acknowledgment of how serious the light pollution and sky glow impacts highly sensitive and protected areas of Monterey County, including Point Lobos and its State Natural Reserve, Santa Lucia Preserve, Carmel Pinnacles State Marine Reserve (SMR), Carmel Bay State Marine Conservation Area (SMCA), Carmel River State Beach, Garland Ranch Regional Park, Palo Corona Park and Hatton Canyon Park. Key organizations have not been properly notified or included in the conversation. Mitigation Measures do not reduce the Significant Impact.

Diminished Visual Character and Quality of the Community: CUSD RDEIR omits and lacks acknowledgment or adherence to local policies, zoning ordinances and regulations. This clearly contributes to the Significant and Unavoidable Environment Impacts that can't be resolved through any mitigated measures, including the lack of acknowledgment that Scenic Highway 1 is Protected by Corridor Program and the project sight is less than 5 feet from the protected highway.

EXACERBATED TRAFFIC AND SAFETY ISSUES IN NIGHT CHAOS: CUSD REIR omits and lacks information regarding traffic and safety plans that go beyond the residential streets of the east side of Highway 1 (which have already been shown as ineffective during daylight game hours) It fails to also integrate a traffic and safety plan for the west side of Highway 1. The RDEIR includes temporary "band-aids" that are short-term, not legally binding, and only identify games/practices when the traffic and safety issues exist during the

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windows of athletic programs. Traffic, parking and street safety problems already exist for regular daylight school attendance.

It's condescending of CUSD to state that a Special Meeting of the Board is already set for November 29<sup>th</sup> to approve a Final EIR. All the above key take-aways, comments and omissions are crucial and will take time for follow-up and deeper assessment. Our expectation is to have all our comments, inquiries, questions and solutions specifically addressed with full and accurate facts and details.

It would appear that CUSD is attempting to have their Special Meeting of the Board before the election outcomes of two new school board members that will be determined in November. Given CUSD has also undertaken re-districting, the community requests that any Final EIR only be voted upon after completion of the re-districting efforts and implementation of appropriate elected officials that reflect the community's minority member voices. This is a significant investment of the school budget and it should fairly integrate the voices of the minorities in the community.

This RDEIR was not prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes account of environmental consequences.

The RDEIR is not adequate, complete, or demonstrates good faith effort at full disclosure. (CEQA Guidelines, section 15151.)

In accordance with CEQA Guidelines section 15143, we need a focus on the significant effects on the environment, so more information is requested as follows:

RDEIR misrepresents other agencies' positions, underestimates the difficulties involved, and contains insufficient detail to allow for proper evaluation. It also fails both to credit properly the difficulties involved in the proposed mitigation plan and to adequately describe the plan in sufficient detail to allow for proper evaluation.

"Significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including but not limited to land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. Project Objectives do not meet the requirements of CEQA Guidelines section, 15124(b). They are not clearly written to help develop a range of alternatives to evaluate in the RDEIR. The objectives are vague, provide no measurable definition and do not help decision makers in preparing findings or a statement of overriding considerations. Given the stated 4.1 Project Objectives are insufficient in analysis, information, and facts, it then logically makes it impossible to use the stated 4.1 Project Objectives to assess the viability of the Alternatives. None of the Alternatives are accurate.

CEQA Guidelines state that an EIR must describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. Thus, we are providing additional Alternatives that are required to be considered.

There is also a lack of inclusion of costs and site plans which are critical inputs to both quantify the objects and fairly weigh any proposed Alternatives against the stated 4.1 Project Objectives. Include site and construction plans (cost benefit analysis) that will be submitted to the The Division of the State Architect (DSA) which provides design and construction oversight for K-12 schools, community colleges, and various other state-owned and state-leased facilities to ensure that they comply with all structural, accessibility, and fire and life safety codes.

CUSD: Provide an enhanced learning environment for both physical education and afterschool sports activities that meets contemporary standards of education and improves the District's athletic program for its Carmel High School students and other students in the District.

If the 2019 Facilities Master Plan: Language Carmel Athletics - Fields with Lighting does NOT specify location, why is the information of Carmel Middle School as a viable solution not future built out?

What would it cost to build out Carmel Middle School as a viable solution for afterschool sports activities? What is a phase approach to building out one field versus all six fields?

What is the cost comparison of building out Carmel Middle School compared to Carmel High School with the same scope? As such, locations such as CMS, OTHER LIGHTED LOCATIONS remain viable alternatives and such specificity should not be included in the stated 4.1 Project Objectives.

What is your definition of your choice of words? Clarify so they are not vague, unclear and help us develop a range of viable alternatives:

Definition of Enhanced: this term is broad, unclear and allows for subjective interpretation

Definition of Contemporary: this term is broad, unclear and allows for subjective interpretation

What is the budgetary cost this goal should be met at? – no reference to total cost or implications to broader school budget.

How are other budgeted priorities comparative to this goal? The 2019 Facilities Master Plan and a Special Board Meeting held on April 24, 2019: indicate CUSD priority for funding and execution was Administration, Wellness Center, Student Union The priority is at risk.

Can you breakout the specific after school sports activities you are referencing here? It feels like Tennis is not a priority if you are demolishing the Tennis Courts.

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Why are you demolishing the Tennis Courts?

CUSD: Provide athletic facilities that facilitate implementation of the State's "Late Start Law" without disruption to the District's existing educational and athletic programs;

Why is Late Start, a CA LAW, regarding school start times, part of an environmental impact report? A CEQA process is not required for Late Start implementation. Furthermore, CUSD is exempt from the law as it qualifies as a rural district. Late Start is not listed as part of the 4.2 Project Characteristics of Improvements – thus the reference in the in a 4.1 Project Objective for a CEQA process should be voice and eliminated from all Alternatives.

Can you include all the details and alternatives CUSD is considering in the implementation of Late Start assessment as part of the dedicated workstream assessment? What are the deadlines and deliverables the School is working on?

What are the School District trade-offs of evaluating implementation of Late Start that go beyond the stadium lights? How do we know how disruptive this is without context of the bigger picture? Is this disruption more or less disruptive than other considerations?

What documentation, research, milestones and deadlines is CUSD evaluating for the merits for CUSD to adopt Late Start?

What are the specific disruptions that you are referencing?

CUSD has publicly stated that the lack of bus drivers is the main reason "Late Start" has not been implemented at CUSD. What are the highlights and key considerations from their transportation report that was released?

Why is the Monterey Peninsula Unified School District able to implement Late Start without stadium school lights and CUSD is not? Can we see a comparative schedule of the two schools to understand why CUSD is not able to execute without disruptions?

What are the implications to elementary and middle school plans if only Carmel High School is the roadblock to executing Late Start? Can we see a comparison of the entire CUSD plan as Late Start is school district implication of holding other school grade to a disadvantage.

CUSD: Provide the capability to host sport events and games for Carmel High School students in the evening when students, parents, and community members can more easily attend;

Evening events put minority students at a disadvantage according to the re-districting breakdowns since they live further away. Why can't you include that breakdown here of where do the minorities live geographically? Are they part of this consideration and how would evening events impact them? This was part of the re-districting work. Are you being punitive to those who live farther away or are minorities?

Indication that most minorities live furthest away from the high school. Late evening athletic events would introduce higher risks and unsafe conditions for minorities. Quantify through survey, data or supportive research.

Provide quantifiable evidence that all stakeholders can more easily attend evening events:

Students: What is the breakdown their distances?

Students: Is this descriptor in reference to attendees and/or athletes?

Parents: What is the breakdown working parents, non-working parents and parents within zip codes? What evidence do we have that parents prefer evening games?

Is the evening attendance preferred for a specific sport or evidence of all the sports? What are the sports?

Community members: provide insight into current attendance. Who is the community? Are these people who are attending current games or new attendees the stadium lights will attract? How do we know?

Staff: Who is the staff? Breakdown is this working staff to athletics or broader staff?

Breakout data, demographics and geographies that demonstrate minorities are not being put at a disadvantage given their distance from the school.

Studies indicated there is a higher rate of safety incidents with night games is this objective reasonable?

CUSD: Improve athlete and spectator safety during evening sports events and games;

What safety factors are currently at risk with existing day-time sporting events? Is this one sport in particular?

Are these risks only isolated to sporting events and/or the broader current safety and traffic issues plaguing the campus now based on the mismanaged and unlawful growth of the campus?

How do you measure "improvements"?

Does this so-called improvement come at the risk of taking away funding and educational priorities that can't be accomplished?

Where are the costs and architectural plans associated with this RDEIR and provide breakdowns as follows:

Costs and architectural and site plans of new parking lots

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Cost and architectural and site plans of storage building being presented as viewing platform

Cost and architectural and site plans of stadium lights

CUSD: Operate an athletic stadium facility that is at least equal with most other local high schools, including the ability to conduct events in the evening.

What is the criteria used to measure other local high schools as comparison?

What is the geographical range of consideration – regional, state, national? What are the names, locations of the specific schools?

If we are assessing what other stadium facilities are equal to CHS, include quantified criteria for measurement and comparisons:

Total invested costs of other local stadium lights

Total student/teacher ratio to number of available parking spaces

Total academic costs and ratio of athletic programs to educational programs.

If we are comparing CHS to other local high schools, we should also include Late Start adoption as a key criteria. Monterey Peninsula High School has adopted Late Start without stadium lights? Will educational criteria also be part of the equation?

CUSD: Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds;

Clarify how each area will be improved and why stadium lights are inter-dependent to the improvement of any on-campus traffic circulation?

Traffic circulation: how is this quantified or measured?

Fire and Emergency Vehicle Access: Is this currently at risk during the day?

ADA access: Is this currently at risk and how is it interdependent with stadium improvements?

What type of stadium lights does Monterey Peninsula College use?

What is the parking capacity at Monterey Peninsula College?

What is the cost to use Monterey Peninsula College?

What type of stadium lights does Pacific Grove High School use?

What is the parking capacity at Pacific Grove High School?

What is the cost to use Pacific Grove High School?

Why hasn't Seaside High School been contacted as an alternative?

What is Seaside High School's Seating Capacity?

What is the current on-campus traffic circulation?

What is the fire and emergency vehicle access route? Current and proposed for all the changes?

Can we have a matrix that cross-references the criteria in a simple snapshot?

CUSD: Improve and expand on-campus parking facilities to meet need at Carmel High School;

Vague statement and not measurable. What does this mean in quantifiable and clear criteria?

How is this connected to "stadium improvements" – this is a parking lot?

Why was the expanded parking lots not assessed in the Notice of Preparation?

Why was the expanding parkings not part of the Scoping Session?

Is parking a problem now? Why can't you describe?

You have conflicting number of parking spaces from the first DEIR (201) to now in this RDIER?

FIRST DEIR: Therefore, the total number of on-campus parking spaces are approximately 238

RDEIR Says 276.

Why are your numbers different and inaccurate from one report to the other?

Given this significant discrepancy, can we see a map that actually counts the spaces? How do we trust you?

You have conflicting estimated of attendees from the first DEIR to now in this RDIER?

FIRST DEIR: *During a homecoming or rivalry game, attendance could be as high as 2,000 attendees. it is estimated that the parking demand for normal Friday night football games would be approximately 247 vehicles based on the anticipated 800 attendees and the surveyed 3.24 vehicle occupancy rate. With 3.24 persons per vehicle, parking for up to 617 vehicles could be required. Under this "worst-case" scenario, which would occur once or twice per year, the on-campus parking shortfall would be approximately 379.*

RDEIR: *It is estimated that the parking demand for normal Friday night football games would be approximately 247 vehicles based on the anticipated 800 attendees and the surveyed 3.24 vehicle occupancy rate. During a*



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homecoming or rivalry game, attendance could be as high as 2,000. With 3.24 persons per vehicle, parking for up to 617 vehicles (2,000 x 3.24) could be required. The high school does not schedule other events on campus that would use up campus parking during football games. Under this "worst-case" scenario, which would occur once or twice per year, the existing on-campus parking shortfall is approximately 341 (617 demand - 276 available) parking spaces.

This is a significant discrepancy. You have no jurisdiction on the residential streets. You underestimate classifying this. It is SIGNIFICANT AND UNAVOIDABLE:

Where is the detailed bases for projected attendees? Games are not ticketed at CHS so what is the foundation of the math you are using?

APPENDIX J: analysis utilized a vehicle occupancy rate based on data previously collected for a homecoming football game on a Friday night at Mitty High School in San Jose, California.

Where the heck did that come from?

How does this school compare to CHS in student population?

How does this school compare to CHS in available parking?

What is this school's Emergency Access Routes?

What is the surrounding geography like for this school?

Why is this a valid comparison? Everything fed into the VMT analysis and output should be thrown out.

You blatantly admit that Spectators who cannot find on-campus parking would likely seek parking on public streets within adjacent neighborhoods in one of the off-street parking spaces in the vicinity.

Why was the residential street surrounding Carmel High School on the east side mapped out and measured and not the WEST Side of Highway 1? Hatton Road and all of Shafter Way exploded with parked cars from the Shoe Game?

Why when looking at transportation and parking don't you do holistically? It is less than 400 feet walking distance to the start of Shafter Way and Hatton Road?

How would all this traffic impact the three elderly care facilities on (Morse & Flanders)?

Is there historical challenges with parking? Why is this connected to the stadium lights?

How is adequate parking determined at Carmel High School?

Is there an agency that dictates school/staff ratio to parking spaces?

Is this improvement connected to the athletic activities or overall campus? If overall, why is this part of the "Stadium Improvement" RDEIR?

What were the parking facilities not part of the Scoping Session?

Why were the parking facilities not part of Notice of Preparation?

How did you decide on the number of new parking spaces that were needed?

Why is the green "outdoor" amphitheater in the middle of the CHS campus not a better location for parking (next to the science building). What is the size of that property for more parking?

What can't portions of the baseball field be ripped out for more parking? Is that batting cage legal? Maybe replace that with more parking?

For the walkway up to the stadium field has the side hill from the baseball to stadium been updated to walk safely versus creating a new walking area? Wouldn't that be more convenient?

The FIRST DEIR: Nighttime Events with SIGNIFICANT: Potential Emergency Access Issues And this RDEIR doesn't even mention this? How did this disappear without comment, mitigation measure or acknowledgement from one EIR Report?

The FIRST DEIR : Caltrans, District 5 (dated May 26, 2021), 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.

THE FIRST DEIR: Transportation Agency for Monterey County (TAMC) (dated June 14, 2021), 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.

While adequacy of parking alone is not within the purview of CEQA impacts, because it is not an effect on the environment; it has been excluded from CEQA review by state law as upheld in Covina Residents for Responsible Development v. City of Covina (CA Second District Court of Appeals 2018). However, secondary impacts on the environment that result from a parking deficit are within the scope of CEQA

YOU STATE below and indicate it's SIGNIFICANT, YET your mitigation measures lack rigor, depth, and could cause a death! This remains Significant and UNAVOIDABLE to the Community!

Impact 11-4. An Increase in Event Attendance Could Result in Inadequate Parking During Limited Nighttime Events with Potential Emergency Access Issues

Mitigation Measure 11-4: has no merit to work or holds attendees accountable to adhere to a "volunteer" program. You have no legal authority to stop people from parking where they want not only surrounding the high school but also on the west side of Highway 1:

Can you insert the outcomes from Shoe Game September 2022? No Event Parking Testing this concept was a disaster.

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How are you going to have California Highway Patrol enforce this?

How are you going to have Monterey Sheriff's Office enforce this?

How would "No Event" parking be able to differentiate from the residents?

Mitigation Measure assumes new parking at ripped up tennis course (but that might not be approved) so what is the worse case scenario for 2000 attendees?

How do you define Emergency Access Route?

Where does the Fire Department and Ambulances play a role here?

Mitigation Measure 11-4 with the parking at Carmel Middle school supports that building the stadium lights here is a more viable solution.

What evidence do you have this Shuttle Service would work? What are the Air Quality, Energy and Greenhouse Gas Emission of this? If you can't measure, how do you know environmentally green which was your goal for the campus?

Why not work with the residents to implement a RESIDENTS ONLY PARKING! This is the only solution. Everything else is a waste of time and effort. You can't run a TMP with short-term Encroachment Permit every time you have an event. That is disruptive to the residential neighborhood.

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:

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;

How many other special events? Isn't the "No Event Parking Signs" a problem for the residents? How is law enforcement suppose to know the difference from the two?

Also you haven't address any of the specific check-list for encroachment permits:

The use of video cameras or film production

Parking needs

Streets, roads affected

Size of attendance

Temporary structures, tents, bleachers, etc.

Liability Insurance

Cooking in tents

Entrances, exits, traffic flow patterns)

Notifying surrounding residents and/or businesses to my event

Event signage or directional signage in the street

Decibels - Amplified music or sound

Event hours after 10pm

Reasonable accommodations for the disabled

Electrical needs

Electrical, plumbing, or HVAC inside any tents during the event

First Aid stations, professional medical services or EMTs

Security

Restroom facility needs, portable or flush

Garbage and recycling impacts

CUSD: Implement "green building" practices that foster energy conservation and replace outmoded athletic lighting fixtures with new fixtures that will obtain dark sky certification.

Clarify if this is speaking specifically to swimming pool lights?

Provide previous CEQA process for the stadium lights. Were "green building" practices not available then?

Which light fixtures does this cover?

What are "green building" metrics or measurements we are looking to achieve?

This is an appropriate stated 4.1 Project Objective. We'd like to see this objective expand and see an audit of all the outdated light fixtures on the school campus. This should not be isolated to athletic sections but the entire campus.

CUSD: Enhance the spectator experience during sporting events by adding an alternative viewing location different from the existing bleachers.

What is the definition of enhanced?

What are other alternative viewing locations?

Why is the viewing platform high level? Can it be just straight bleachers?

Will sound increase at the higher level platform?

What are the materials of the higher level platform?

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What would the signs look like to limit the amount of people on the platform?  
Why is the design in concept form? Where are the specs?  
What wasn't this part of the Scoping Session  
What wasn't this part of the Notice of Preparation?  
Why is this in the concept stage? Too much influx – moving design – how can we provide any comments?  
What is the current capacity of the stadium and what is the proposed goal of the viewshed? How does that impact the attendance rate and implications to parking lot?  
CUSD: Augment the secure storage space available to the District's athletic programs;

Unclear what goes into the needed secure storage space? Is this just for athletic programs? We thought drama and theater sets were stored there? Is this connected to stadium lights or broader school needs?

Is this new stuff or old stuff being moved?

CUSD: Create a new, healthy weekend social opportunity for District students while building school spirit;

What are additional ranges of activities for building school spirit that don't impact the environment or cost. Parent Teacher Association, one of the oldest and largest child advocacy association in America, provides comprehensive approaches to building school spirit that is inclusive to the entire school body not just athletes.

Why are options to build school spirit isolated to athletic improvements for fewer students versus opportunities for the entire study body.

Research indicates that higher investment in Mental Health and Wellness Programs are a key priority in a Post Covid environment. This is more cost effective, doesn't introduce significant environmental issues and is more cost effective. In addition, CUSD has had problems with Sexual Harassment. How about invest in basic programs that allow children to flourish with harming the environment.

You indicate this is for weekend? The stadium light schedule indicates weeknights? What are the weekend social opportunities that need lights?

What is the definition of Healthy?

What are current weekend social events? Can you improve those versus introducing news?

CUSD: Reduce operational difficulties and complex coordination issues with respect to the scheduling of practices and games for District athletic programs;

These complications don't currently exist. If they do, where are they outlined with clarity? Weekend day games have been on-going for more than 85 years.

CUSD: Achieve these objectives consistent with the intent of the Facilities Master Plan that was presented to the District's Board on June 26, 2019;

REMINDER: A Facilities Master Plan shows a general path of how to get to the goal, but it does not provide specific design solutions. Thus, anything included in the 2019 Facilities Master Plan does not mean it has been approved or passed CEQA requirements.

There is NO mention or inclusion of Late Start in the 2019 Facilities Master Plan.

As projects are developed over time, the FMP should be revisited and updated so that it reflects the changing needs of the Carmel Unified School District. This master plan update process is recommended by the California Department of Education every three to five years. It's time to update the master plan in this post COVID environment.

2019 Facilities Master demonstrates CMS is highly viable solution for expanding athletic activities.

Isn't it time to refresh and re-visit the Facility Master Plan. It's dated and doesn't provide the best long-term vision of what is right for the community. We survived COVID. Let's start fresh.

CUSD: Achieve these objectives within the District's allocated budget allowances. You've introduced the word budget allowance, but you provide no details on do you meet the budget allowances? What the budget allowances for each of the listed project characteristics

Stadium field lights:

Why was Musco chosen as the vendor? Did you violate a competitive bidding process?

Why is there not a dimmer switch?

What is the use of the Show Light Entertainment Packaging? When would that be used? What are the activities that would trigger it? Is there what is the usage policy?

New storage building with a standing, viewing platform adjacent to the home bleachers;

What is the design a combo viewing platform and building storage?

Can the storage unit be located elsewhere to keep the bleachers flat and even with the others?

What is the cost of this?

A new parking area with 35 standard spaces east of the existing swimming pool;

What is the distance of this parking space to the entrance of the athletic fields?

What is the distance of putting the parking lot in that green open space near the science building? Wouldn't that make a closer parking lot that east of the swimming pool?

A new parking lot with 76 standard spaces replacing the existing tennis courts

This is a new scope of work. Why not part of the Scoping and Notice of Preparation?

Where are the design specs?

Why 76 spaces?

Can you have half parking and half tennis courts?

What sections of the baseball field be converted to more parking?

Does the batting cage have a Notice of Exemption? What can't that section be parking spaces?

What is the budget for this?

south of the stadium, including a new 18-foot drive aisle connecting the existing

What would this look like as a walking path?

Why do students need to drive through this?

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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.

Why can't you do this now outside of the larger scope of the RDEIR?  
What is the cost of this?

#### Emergency Access Routes

You have avoided point blank responses on what is your Emergency Access Routes - current and proposed changes.

Are you currently aware of gaps and vulnerabilities in your Emergency Access Routes that you are not disclosing?

What is your current traffic vehicle circulation layout like during the daily school drop-off and pick-up?

How does your traffic circulation plan change with proposed increased games of up to 124 in both football and soccer. You provide a flimsy, non-executable TMP for off-site but don't discuss what the visual layout on your main parking lot looks like for benchmarking and future.

#### Light Pollution:

You conveniently hide that you are not providing cumulative light pollution implications .

You provide: Table 4-3 Proposed Stadium and Pool Facility Lighting Schedule but you hide the total days of overlap by month and by total roll-up

You don't provide the cumulative light impact on any of your light data when all of Appendix C should show the COMBINED overlaps of stadium and pool lights being on TOGETHER

#### Scenic Highway 1

You've added a significant amount of new scope that directly impacts Scenic Highway 1 yet you provide no details, no specs and no disclosure that you knowing know the projects violate the Protected Corridor Program.

The 18 foot roadway - how close is it to Scenic Highway 1?

What will be the visual impact of the Parking Lot with 12 foot lighting poles from Scenic Highway 1 and the intersection of Morse that is highly visible?

#### Baseball Field

You conveniently neglect to discuss and include the baseball field as part of the athletic improvements despite the fact it sits closer to the stadium field than the lights.

Many disrepairs included a blocked off staircase that has a chain linked fence blocking it like a danger zone.

Potential Emergency Access Route violation in the lane leading up and down the baseball field.

As previously stated, 4.1 Project Objectives do not meet the requirements of CEQA Guidelines section, 15124(b). They are not clearly written to help develop a range of alternatives to evaluate in the RDEIR. The objectives are vague, provide no measurable definition and do not help decision makers in preparing findings or a statement of overriding considerations. Given the stated 4.1 Project Objectives are insufficient in analysis, information, and facts, it then logically makes it impossible to use the stated 4.1 Project Objectives to assess the viability of the Alternatives. None of the Alternatives are accurate.

CEQA Guidelines state that an EIR must describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.

Thus, we are providing specific Public Comments for each of the alternatives AND NEW Alternatives that are required to be considered.

In addition, while the 4.2 Project Characteristics of Improvements, the Alternatives include confusing and unclear connections to the real "improvements" with unrelated, non-CEQA or environmental topics. Remove Late Start from the Alternatives including title. Late Start is NOT a construction improvement, it is a CA Law, thus not part of this CEQA process. In addition, CUSD has stated that Late Start is a separate workstream. In addition, a June 2022 Board Presentations State of Transportation Home [\[Find and show EXHIBIT\]](#) indicates that school transportation is currently unfunded and the root cause of delaying Late Start (not improvements to athletic fields).

Reference the actual 4.2 Project Characteristic of Improvement:

Installation of the field lighting stadium lighting

Fix Light Pollution from Existing Pool lights

A new stadium storage building, with a spectator viewing platform

New Parking Lot: Proposed Southwest Parking Lot with Lights (76 Spaces) replacing Tennis Courts

4 Foot Sidewalk from Baseball Field (Not needed if Tennis Courts are not be ripped out)

New Parking lot: Proposed East Parking Lot (35 Spaces) up against Flanders Residence

New, internal roadway connecting the on-campus parking located within the existing high school property

CUSD Alternative 1: No Project-No Late Start;

Public Comments to Address:

Alternative Description is Inaccurate, and we disagree:

Late Start is not part of a CEQA Process but a CA State Law. CUSD is exempt from this law. In addition, Late Start can be executed if Transportation Solutions are Solved as stated in



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CUSD Alternative 2: No Project-With Late Start  
CUSD: Alternative 3: Reduced Project Alternative with After Dark Practices and Games at Alternative Locations (Monterey Peninsula College and Pacific Grove High School);  
CUSD: Alternative 4: Alternative Location (New, Lighted Stadium at Carmel Middle School) for Practices and Games  
CUSD: Alternative 5: Reduced Project Alternative (No Stadium Lights).

New PROPOSED Alternative: **MOST ENVIRONMENTAL SOUND, SUPPORTS STUDENTS, HIGHEST COST SAVINGS**

We believe the below Proposed Alternative would meet the CEQA Guidelines that state that an EIR must describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project

Approve the fix causing light pollution for the current swimming pool lights

Moves No Alternative SOLUTION to Higher Environmental Improvement with potentially small budget investment.

NO TO STADIUM LIGHTS:

Prevents the occurrence of Significant and Unavoidable Environmental Impacts even after mitigation measures

The million dollars savings of rejecting this scope would allow for budget savings to be deferred to helping solve the transportation / bussing challenges to meet the Late Start requirements. Thus, several of the objectives could be achieved in a more sustainable and cost-effective way. In addition, the benefit of shifting the dollars to transportation for Late Start would have a broader positive impact on the school body versus the limited approach to athletics.

NO TO RIPPING OUT TENNIS COURTS for Parking Lot

Minimizes risk of harming Special Status Species with Potential to Occur in Vicinity

Minimizes risk of harming Special-Status Plant Species with Potential to Occur in Vicinity

Recommendation is to assess the cost to Fix the Tennis Courts: Save the Tennis Students from all the off-site games (travel, VMT), Saves Dollars, Saves Trees

NO to VIEWING PLATFORM that is disguised as a shed

In concept stage, no real plans, specs, details

Was not included in the Scoping Session and/or Notice of Preparation

Properly assess the opportunity for growth at Carmel Middle School (a 60+ acre campus) with more than 6 athletic fields already identified for growth in the CUSD 2019 Facility Master Plan.

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Explain why you are incorrectly naming this Revised Draft Environment Impact Report?

Misleading and inaccurate new name: "Carmel High School Stadium Improvements Project 1.1 p

ORIGINAL Draft EIR NAME: "Carmel High School Stadium Lights Project 1.1

RDEIR acknowledges "The school district has substantially revised the draft EIR substantially revised 1.2"

and "This RDEIR replaces the previous RDEIR in its entirety (1.5). The DREIR doesn't include why multiple new scopes of work have any direct relationship to stadium improvements. If these new scopes of work are directly related to stadium improvements, provide the necessary facts and details so make an informed decision on the DREIR. The title of the RDEIR implies that scope of work should be limited to the installation of stadium lights and new viewing platform that also functions as a storage building.

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1.5 EIR PROCESS Notice of Preparation (NOP) Notice of Preparation has been mis-managed. Provide the following facts and details:

How was the notice of new RDEIR publicized? Provide specific information to include:

Which newspapers? Why or why not were local publications like Monterey County Weekly and The Herald not included in the public notice when the school district is part of Monterey County?

What was the effective tool of communication to notify underserved communities that would be significantly impacted including Cachagua, Carmel Valley and Big Sur when Latino families and other minorities make up part of the rural district.

With re-districting in the process, CUSD has detailed information where the minority community lives and should be part of the NOP process especially when something as critical as Late Start is being held hostage to the approval process.

CUSD has weaponizes the definition of "Rural District" for their own use, so explain how the process of Notice of Preparation properly addresses the Rural Districts.

How many NOP e-mails were sent and to which zip codes and neighborhoods?

How many NOP letters were sent and to which zip codes and neighborhoods?

Given the lack of detail on the process above, when CUSD promptly pushed out an update link on 8/25, it nullified the entire process **INSERT EXHIBIT**:

[https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/1/NOA%20Letterhead%20-%20RDEIR\\_FINAL\\_REVISED\\_8\\_25\\_22.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/1/NOA%20Letterhead%20-%20RDEIR_FINAL_REVISED_8_25_22.pdf) called - Reissued Notice of Completion and Availability to reflect corrected e-mail address where public comments on the Revised/Recirculated Draft EIR may be submitted.

This "Reissued Notice" should force a qualification for an officially re-start of the clock for window of comments, notification, and submissions. This is a deliberate misstep to confuse the public and not allow for efficient processing of submitting comments.

Explain facts and details to what is the NOP process with the identified mis-managed step. What are corrective actions?

"This RDEIR will be circulated for a 45-day public review period" pg 22 Public Review

The RDEIR did not have an accurate 45-day public review period. On August 19, 2022, CUSD published in the Carmel Pinecone (Real Estate Section pg 20 - not main News Section) what was what CUSD deemed official notice of public availability for the Revised DEIR. A copy of the ad (CUSD Should **INSERT EXHIBIT**) indicated an electronic copy was available when in fact it was not at the time of ad publication.

"Address Where a Copy of the RDEIR is Available: A copy of the RDEIR can be viewed in person at the Carmel Unified School District office, 4380 Carmel Valley Road, Carmel, CA, by appointment. A copy of the RDEIR is also available electronically on the Carmel Unified School District website:

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(<https://www.carmelunified.org/>) under the CUSD Announcements section.”  
Highlight the gap between when the ad was placed to the accurate window of when the RDEIR was available. Also, given the e-mail address was inaccurate, the Notice should be VOID and the clock of the RDEIR should re-start with the accurate timeline.

The RDEIR has not included an adequate description of the physical environmental conditions in the vicinity of the project as they exist at the time the notice of preparation was published either from a local or regional perspective. Given the environmental setting will normally set the baseline physical conditions by which a determination can be made about an impact and its significance, this section need to be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes account of the environmental consequences. We also believe the RDEIR doesn't demonstrate good faith at full disclosure (CEQA Guidelines, section 15151.)

Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The RDEIR hasn't demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed. It currently doesn't permit the significant effects of the project to be considered in the full environmental context.

The RDEIR doesn't fully discuss any inconsistencies between the proposed project and applicable general plans and regional plans. Such plans may be the applicable air quality attainment or maintenance plan or State Implementation Plan, regional transportation plans, regional housing allocation plans, habitat conservation plans, natural community conservation plans, and regional land use plans for the protection highly sensitive or sensitive areas. We again, don't believe the RDEIR has demonstrated good faith at full disclosure.

State Route 1 Corridor (Carmel River to State Route 68) Visual Character and Quality  
Visual and Character Qualities are not fully or accurately described regarding the 5.8-mile segment of State Route 1 between Carmel River and the State Route 68 interchange and roundabout was officially designated as a State Scenic Highway by Caltrans in 1970 (Caltrans 2021).

Fully disclose all the details to protect this corridor including but not limited to:

Scenic corridors are defined as corridors that possesses highly scenic and natural features, as viewed from the highway.

Topography, vegetation, viewing distance, and/or jurisdictional lines determine the corridor boundaries.

Insert the exact language that the CPP uses to summarize the city or county ordinances, zoning and/or planning policies (collectively called “visual quality protection measures”) that preserve the scenic quality of the corridor. You reference it but don't spell it out? What is the exact zoning, ordinance and/or planning policy of the scenic quality?

What is the topography that needs to be protected? What would violate it

What vegetation currently exists as the benchmark?

What is the viewing distance of each 4.1 Project Characteristic (stadium, parking lots, viewing sheds, etc) to the legal starting point of the protected Scenic Highway 1?

Exactly what earth moving and landscape will occur near Scenic Highway 1

Specific design and appearance of structure and equipment is required for us to see (you have to provide details).

Include the five elements required by legislation defined as follows:

Regulation of land use and density of development;

Detailed land and site planning;

Control of outdoor advertising;

Careful attention to and control of earthmoving and landscaping; and

The design and appearance of structures and equipment.

Also include the California Historic Parkways are freeways that meet all of the following criteria:

The original construction was completed prior to 1945.

The department or the Office of Historic Preservation in the Department of Parks and Recreation announces or recognizes features of historical significance, including notable landmarks, historical sites, or natural or human achievements that exist or that occurred during the original construction of the parkway or in the immediately adjacent land area through which the parkway currently passes.

Any portion of the highway or corridor is bounded on one or both sides by federal, state, or local parkland, Native American lands or monuments, or other open space, greenbelt areas, natural habitat or wildlife preserves, or similar acreage used for or dedicated to historical or recreational uses.

Can we see a detailed map, with markings and measurements.

Any portion of the highway is traversed, at the time of designation and by the department's best count or estimate using existing information, by not less than 40,000 vehicles per day on an annual daily average basis

Include the benefits of official scenic highway designation:

Official designation requires a local governing body to enact a Corridor Protection Program that protects and enhances scenic resources along the highway. A program that is properly enforced by the applicable local government(s) can:

Minimize the encroachment of incompatible land uses such as junkyards, dumps, concrete plants, and gravel pits, etc. along the scenic corridor.



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What Encroachment Permits will you submitting for? Can we have detailed specs, timing, contractors and vendors?

Emphasize the preservation of visual quality through aesthetic siting, landscaping or screening.

Prohibit billboards and regulate on-site signs so that they do not detract from scenic views. Encourage development that is more compatible with the environment and in harmony with the surroundings.

Regulate grading to prevent erosion and cause minimal alteration of existing contours and to preserve important vegetative features along the highway.

Preserve views of hillsides by minimizing development on steep slopes and along ridgelines.

Reduce the need for noise barriers (sound walls) by requiring a minimum setback for residential development adjacent to a scenic highway.

In addition, official scenic highway designation may:

Enhance community identity and pride, encouraging citizen commitment to preserve community values.

Enhance land values by maintaining the scenic character of the corridor.

Provide a vehicle for the community to promote local tourism that is consistent with the community's scenic values

We FIRMLY DISAGREE that the governing board of school district has the authority to render city or county zoning

ordinances and general plane requirements applicable to the project site. On PAGE: 123, The RDEIR significantly and deliberately ignores the Greater Monterey Peninsula Area plan) GMP 3.3 Greater Monterey Peninsula Scenic Highway Corridors and Visual Sensitivity map (Figure 14). **CUSD include the referenced map** for the public to see!

This entire project violates the Greater Monterey Peninsula Area Plan. Show us how this project maintains no less than a 100-foot setback from the scenic route right-of-way; Show this to us on a map visual with measurements!

In addition, expand your Figure 5.2 Viewshed Map beyond the 3.5 miles to show all of the impacted areas regardless of miles from the high school. Disclose how far out to Carmel Valley will the light pollution be shown? Will it reach the Santa Lucia Preserve? Include all the environmental settings and implications to this geography.

Given Figure 5.2 Viewshed Map shows the geographic impact of where the light pollution will be seen, Include the environmental settings and implications to the following areas:

PointLobos

PointLobosStateNaturalReserve

SantaLuciaPreserve

Carmel Pinnacles StateMarine Reserve

Carmel Bay State Marine ConservationArea

Carmel River State Beach

Garland Ranch Regional Park

Palo Corona Park

Hatton Canyon Park

Also in your Environment Sections, why aren't you including Carmel-by-The Sea which is less than ½ mile from the school? You must describe its unique characteristics. Will you be violating any sections of their General Plan? Are you aware they are part of the Sphere of Influence and will be part of your outcome?

Reference and include the Coastal Resource Management Element **EXHIBIT INSERT**

Section 2 – Findings and Declarations for Habitat for Monterey Trees. Why not mark existing trees and which ones you are specifically marked for removal?

Public Comments to Address on the Table 2-1, Summary of Significant Impacts and Mitigation Measures: We do not agree with [Table 2-1, Summary of Significant Impacts and Mitigation Measures](#):

Mitigation measures were not proportional to the impacts of the project

Significance Level after Mitigation were understated

Not enough information was included to determine the Significance level

The RDEIR is absent of detailed information about a project's environmental effects, ways to minimize the project's significant environmental effects, and reasonable alternatives to the project. We are seeking clarity in the details as follows:

Table 2-1 Summary of Significant Impacts and Mitigation Measures does a poor job of including enough basic information to allow decision making to be easy and effective. In addition, it is missing critical information as indicate below. Update TABLE 2-2 accordingly to comments and mitigation considerations.

Under AESTHETICS: RDEIR readily admits - Significant and Unavoidable Impact even AFTER mitigation measures. To quote. Thus NONE of the mitigation measures are even "roughly proportional" to the impacts of the project.

5-2 -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

5-2: LIGHT POLLUTION AND NEW SOURCES OF LIGHT AND GLARE:

An important part of providing mitigation measures regarding light pollution is to have a feasible and basic understanding of the magnitude of light pollution and sky glow that is currently occurring with the pool lights and will occur with proposed stadium lights. Light pollution is the alteration of the natural quantity of light in the night environment produced by the introduction of manmade light. As Carmel High School continues to build out, they are contributing to light pollution which is a major side-effect of urbanization of Carmel. Light pollution compromises health, disrupts ecosystems, and spoils aesthetic environments. Include more responsible facts. The provided Figure 5-2 Viewshed Analysis Map was limited in its 3-mile radius and not inclusive of the larger scope of impact.

What is basic measurement of Light Pollution (sky glow) that will be seen by the new proposed stadium lights and what are the basic measurements of Light Pollution of the existing pool lights? Are these cumulative effective together and/or alone? What are the specific lights fixtures that would be added to the parking lots and what is their contribution to the total light pollution? How do all these components play a role in the measurement of light pollution and sky glow?

Provide a more specific viewshed analysis of the communities that will be impacted with the proposed stadium lights and with the existing swimming pool lights beyond the 3-mile radius? Be clear where the light pollution geographically starts and ends outline (mark specific streets on map and/or zip codes beyond the 3 mile radius). Have these communities and residents been notified of Significant and Unavoidable Impacts even after mitigation measures? They have not been given a fair opportunity to weigh-in on this process.

This basic modelling of light pollution and viewshed analysis beyond the 3 mile radius should have been included in the RDEIR, so all appropriate organizations and communities that will be impacted can weigh-in on the process. The following organizations should be asked to comment and ensure they are aware of the Significant and Unavoidable Impacts even after mitigation measures are put in place:

All protected areas of Monterey County, California including Point Lobo and Point Lobos State Natural Reserve, Santa Lucia Preserve, Carmel Pinnacles State Marine Reserve (SMR), Carmel Bay State Marine Conservation Area (SMCA), Carmel River State Beach, Garland Ranch Regional Park and Hatton Canyon.

5-2 County-Designated Visually "Sensitive" and "Highly Sensitive Areas. There is no break-out or details of what these areas are? This language deliberately ignores obvious local policies, regulations and program that are in place to protect people and the environment. Specify all areas that are include in this language. Below are some considerations but this list should not exclude others you are aware of:

Does this language of County-Designated Visually Sensitive and Highly Sensitive Areas include Scenic Highway 1 is that is Protected by Corridor Program? Explain how the visual quality protection measures that are in place for Highway 1 will be impacted by this project? How many feet away from the Protected Corridor will all the construction and final plans of this project be to this region? Have you informed appropriate organizations to weigh-in on the process? Policy does require any new development along Highway 1 to be sufficiently back to preserve the forested corridor effect and minimize visual impact. The entire project is found to inconsistent with this policy. The existing vegetation is considered a scenic resource that is an important component of the visual integrity of the Highway 1 corridor. State specific implications including which trees would be removed and how that impacts into the significant and unavoidable impact.

Does this language include Carmel-by-the-Sea's Sphere of Influence and a community that prides itself on the village character through clear policies and regulations that guide development? How close is this project to Carmel's sphere of influence? Is this project inconsistent with the Land Use of Element, will it create negative traffic and circulation impacts on the residents? Will it degrade streets by the City of Carmel-by-the-Sea? Carmel-by-the-Sea will want to weigh-in on the significant removal of Monterey Pine and Coast Live Oak trees that you are planning but should be preserved.

Does this language include Coast Commission implications? How are you from the ocean and protected policies?

Does this language include the Monterey County Department of Public Works, Facilities and Parks and areas that surround Palo Corona Park and/or Hatton Canyon Park?

5-2 Modify the Visual Character and Quality of the Site. There is no break-out or details on what this means or includes. Specify all areas that are included in this language. Below are some considerations but are not exhaustive inputs pending you provide more details.

Request installing ridge poles with flags or balloons, which would help the neighborhood and community at large understand what the real visual and environmental impacts the four 80 foot tall stadium lights would be. These poles would be visual markers event during the day and can easily be seen and impact the beauty of the protected Scenic Highway 1. The school also serves as a welcome to the tourists and visitors to Carmel-by-the-Sea. Residents and local businesses should be clearly aware of the negative impact of the visual character and quality of the site by day and night.

AESTHETICS Mitigation Measure 5-2a - to prepare and adopt a policy.

A policy is not an effective mitigation measure.

Policies created by CUSD can't be legally upheld to protect the community. At the whim of revolving CUSD leadership, restrictions can easily be changed immediately following all the stadium improvements and lights are in place. This project is permanently irreversible and mitigation measures must be real and substantive. CUSD has a history of changing leadership especially at the Superintendent level (seven leaders in the past seven years). A policy is introducing more chaos.

What is a more legally binding document than a policy? This legal document would have to be one that would override the Civic Center Act (Government Code § 38130 et seq.) ("Act") that declares that every public-school facility is a civic center in which the public may meet and engage in certain activities. How might this legal document be socialized, negotiated, and be set for generations to come? How can the legal document include sanctions which can be imposed on the school if the legal document is changed post the FEIR?

Why aren't details of the proposed policy outlined so the community can understand the intent of the

current CUSD leadership? Can members of the community who are Significantly and Unavoidable Impacted be part of developing the legal document?

In addition, given the scope of this RDEIR includes "Replacing light fixtures at the swimming pool with LED light fixtures", its unclear how this policy be new and/or different that the current usage policy for the pool? The RDEIR is named Stadium Improvements Project. The swimming pool is not a stadium. In a December 2021 Community Listening Session, the Superintendent along with the Facilities manager promised to change the swimming pool usage policy within several months. They have broken their public promise that is on record. CUSD INSERT EXHIBIT for Public to see Clarify why the swimming pool with an existing policy is part of this RDEIR? An alternative option would be to fix the current swimming pool lights as a separate item outside of this RDEIR.

By moving forward in any of these stadium improvements, CUSD is creating a private nuisance with disruptive behavior that obstructs or interferes with the private right of use and enjoyment of their property. These cases generally involve a person who engages in

AESTHETICS: Mitigation Measure 5-2a goes into unorganized thought process on what are the current/future teams schedules without clear alignment to why lights are need. Significant information is missing on all the new projects in this version of the RDEIR.

A total of forty-four 44 games (that is almost one game a week vs. 37 in the original DEIR) have been identified. If Table 3-1 Existing Schedule of Stadium Uses (2022-2023) is now being accomplished without stadium improvements or stadium lights. How would the investment of the changes improve anything? Not enough information is provided on why the stadium improvements or lights are critical to any stated objective.

Comparison of the difference in Table 3-1 Existing Schedule of Stadium Uses (2022-2023) vs. Table 4-2, Proposed Schedule of Stadium Uses (After Installation of Field Lights) is not possible because of omission of needed details.

COMMENTS AND FEEDBACK:

Overlay in a simpler chart to include the missing information and comparisons of where are the current games/meets happening (site location), what is exactly changing and what is the need? Clarify why those needs can't be met with new fields at CMS during the day (no necessary new investments).

In 2018, CUSD acquired a 8.23-acre parcel adjacent to CMS Carmel Middle School and the 2019 Facilities Master Plan visualized the potential for 6 fields. A realistic ALTERNATIVE OPTION that needs to be assessed and included is the build out of the 6 fields so that the various athletic sports teams could simultaneously meet and/or practice with significant flexibility and great ease. What would be the cost, investment and alternative look like to complete those fields vs. the time and effort of this R DEIR?

CUSD Insert EXHIBIT that clearly shows the 6 Field Potential

Mitigation Measure 5-2b. Indicates 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.

Re-iterating all the comments regarding a policy is not a legally binding document. Policy can be easily changed at the whim of an ever-evolving educational leadership team. To demonstrate how unstable the leadership team is CUSD include all the names, years over the last ten years of Superintendents and CHS Principles. Include the contract the facts that the current Superintendent's contract has not been renewed. This will demonstrate how unstable leadership is and can change at any time.

ADDRESS WHY HAS A POOL POLICY NOT BEEN ADOPTED TO DATE? No Credibility or Trust you will do so

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.

This section specifically speaks to two different sets of lights: Potentially new stadium lights and existing pool lights. Each should be addressed differently and in very specific terms:

Existing Pool Lights: Why wasn't an energy specialist hired now to provide feedback on how to reduce the intensity of the existing lighting at the campus? This should be a simple and feasible task to accomplish as part of the RDEIR. In addition, the superintendent is on public record that he acknowledges the existing pool lights cause significant light pollution, that he would fix and that the policy would be changed EXHIBIT INSERT

New Stadium Lights: this should be done prior to any construction. What is the specialist's recommendations can't be implemented because the lights have been already installed?

Parking Lot Lights: The specifics of these lights need to be included in any and all sections that reference light. Discussion should be how the cumulative light is impacting everything (pool lights, stadium lights and parking lot lights).

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.

The current swimming pool lights should be immediately fixed or as stated above - there should be no more usage until the school district shall obtain and IDA Field Verification letter and posted on the school district's website for public review. Explain why "pool lights" are part of this Revised DEIR and how pool lights are connected to stadium improvements?

Explain and speak to the below facts of current light pollution an address why "swimming pool lights are not fixed now" :

In November 2005, Carmel Unified School District passed a \$21.5 million Measure A Bond)

The California Debt and Investment Advisory Commission under Summary of Local Bond and Tax Ballot

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Measure CUSD **INSERT BOND SUMMARY EXHIBIT**.

The Measure A school improvement program, authorized under the passage of Proposition 39, includes modernization and expansion of all schools in the Carmel Unified School District.

A new swimming pool with [lower-level competition lighting](#) was completed in June of 2007. **CUSD INSERT EXHIBIT OF VISUAL HERE**.

Funding sources are listed as

\$3,517,474.00 2005 General Obligation Bond Proceeds

\$223,720 Other Financial Sources

\$3,741,194.00 Total Project Cost

Post completion of the swimming pool with lower-level lights, four facility lights mounted on a 60-foot high lights and poles were installed immediately adjacent to the stadium to the northwest.

Referencing the above facts, an outstanding CPRA request has not been completed by CUSD that contains critical information to help determine the validity of this R DEIR. The CPRA should be expedited and/or the public comment period should be "frozen" in order for the below information to be provided to the public:

PROVIDE Next Level of detail TO THESE QUESTIONS:

Cost breakdown of the swimming pool with lower-level competition lighting

Contractor name who installed for the four facility lights mounted on 60-foot-high poles.

Technical specs of how bright/lumence/candles/glare of the 60-foot-high lights.

Start of installation, construction and completion date of the 60-foot-high light poles.

Total cost of 60-foot-high lights and poles. Provide invoices.

Budget and line-item source for the 60-foot high lights and poles. Provide copy of budget that highlights year, final cost, approval.

Under Table 2-1 Summary of Significant Impacts and Mitigation Measures, Aesthetics, why are the new and expanded projects not included with highlighted impacts and mitigation measures? Can you address how each bullet would fit under Aesthetics and proposed mitigation measures?

New storage building with a standing, viewing platform adjacent to the home bleachers;

PROVIDE RESPONSES the following questions:

What is the view and aesthetics for all the homes located on the backside of Flanders who are up against the CHS's property line? What does the viewing platform look like with people standing on the platform? How does the sound travel from this height into the neighborhood?

What is the material of the structure? How high are guard-rails to protect people when standing on the viewing platform? What is the capacity of the viewing platform? What is the weight limit of the viewing platform and how will it be monitored?

New parking area with 35 standard spaces east of the existing swimming pool;

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;

What are the front facing aesthetics for all the residents on Morse Drive? What does this look like for all the passengers on Highway 1 and how does that align with the protected measures?

Construction and architectural plans are not complete and we don't have enough level of detail to provide meaningful comments of how this new scope will impact the Aesthetics.

Under Table 2-1 Summary of Significant Impacts and Mitigation Measures, Biological Resources

Most of the discussion under this section should be characterized as both inaccurate and misleading and thus insufficient under the National Environmental Policy Act. The National Environmental Policy Act (NEPA) was signed into law on January 1, 1970. NEPA requires federal agencies to assess the environmental effects of their proposed actions PRIOR to making decisions. All caveats that assessments will be made post the Final EIR are not acceptable. The plan misrepresents other agencies' positions, underestimates the difficulties involved, and contains insufficient detail to allow for proper evaluation. Throughout each of the section, how light and noise pollution impact the environment should be outlined, address and clarified.

Mitigation Measure 7-2, 7-3, 7-6.

The RDEIR should have been clear which on which trees need to be removed or trimmed. The "14 Days prior" language should be removed, and the school district should 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 prior to any construction being conducted.

The same logic and process should be applied to all sections of Biological Resources. Removal of all timelines should be done and clear indication of what trees need to be removed or trimmed to assess Biological Resources.

Furthermore, The school district is not qualified to be responsible for implementation of this mitigation measure across all of the Biological Resource areas. An expert should be appointed.

This summary should also include impacts to Hatton Canyon, a canyon in Carmel Valley, California, USA, preserved for urban open space as a state park property. The canyon harbors Monterey pines and 10 acres of wetland. CUSD's construction is close to this protected area. What are the biological implications?

We also have a significant wildlife population in our area, deer, fox, coyotes, raccoons, skunks, opossums, squirrels and burrowing rodents. How would the light and noise pollution disrupt this



Integrate biological resource impacts to these protected areas near the project. Highlight on a map the distance from the project and include light pollution/sky glow/viewshed implications along with noise pollution:

Carmel Bay State Marine Conservation Area (SMCA) is a marine protected area in Carmel Bay. Carmel Bay is adjacent to the city of Carmel-by-the-Sea and is near Monterey, on California's central coast. The marine protected area covers 2.12 square miles. Recreational fishing of finfish and limited commercial taking of kelp is permitted within the SMCA.

Carmel Pinnacles State Marine Reserve (SMR) is a marine protected area in Carmel Bay including a unique underwater pinnacle formation with adjacent kelp forest, submarine canyon head, and surfgrass. Carmel Bay is adjacent to the city of Carmel-by-the-Sea and is near Monterey, on California's central coast and within the proximity of this project.

Point Lobos and the Point Lobos State Natural Reserve is a state park in California. Adjoining Point Lobos is "one of the richest marine habitats in California. The ocean habitat is protected by two marine protected areas, the Point Lobos State Marine Reserve and Point Lobos State Marine Conservation Area. The sea near Point Lobos is considered one of the best locations for scuba diving on the Monterey Peninsula and along the California coast.

Point Lobos is just south of Carmel-by-the-Sea, California, United States, and at the north end of the Big Sur coast of the Pacific Ocean. Point Lobos features a number of hiking trails, many alongside the ocean, and a smaller number of beaches.

The Santa Lucia Preserve or The Preserve (formerly Rancho San Carlos) is a private, 20,000 acres (8,100 ha) gated development permitting 297 homesites. It is located in the foothills of the Santa Lucia Range between Palo Corona Regional Park and Carmel Valley, California. The Preserve consists of a 12,000 acres (4,900 ha) nature reserve.

Carmel River State Beach is a state park unit at the mouth of Carmel Valley, California, United States, featuring a 1-mile-long (1.6 km) protected beach with a lagoon formed by the Carmel River. The lagoon attracts many migratory birds. The state beach includes Monastery Beach, (also called San Jose Creek Beach) which is popular with scuba divers. Sea kayakers also frequent the beach, which has easy access to the natural reserves of Point Lobos. The 297-acre (120 ha) park was established in 1953

Garland Ranch Regional Park is a 3,464 acres (1,402 ha) public recreational area at 700 West Carmel Valley Road, in Carmel Valley, California.[1] It is owned and managed by the Monterey Peninsula Regional Park District.

Hatton Canyon is a canyon in Carmel Valley, California, United States, preserved for urban open space as a state park property. The canyon harbors Monterey pines and 10 acres (4.0 ha) of wetland.

Provide details to the Caltrans Scenic Highway System Map and the Monterey County General Plan (Figures of – Scenic Highway Corridors & Visual Sensitivity, Greater Monterey Peninsula), the nearest officially designated State of California scenic highway to the project site is State Route 1, and approximate miles from the project site. Be very specific to portions of State Route 1 are visible from or in the vicinity of Carmel River

Figures and details should also include areas further south towards the Carmel Highlands and Point Lobos State Natural Reserve which are identified as "Highly Sensitive." What are the public views are available on or towards these areas from the project site? Include implications to all sensitive environmental areas including identified wetlands and project environmental plants and animals.

#### Under Table 2-1 Summer of Significant Impacts and Mitigation Measures Noise

RDEIR recognizes that the "Impact 10-3. Construction Activities Could Cause a Substantial Temporary Noise Increase" but 1). incorrectly underestimates and mis-categorizes mitigations measures as Less than Significant and 2) omits key areas of assessment. 3). Doesn't delineate what is Temporary versus address real permanent noises.

RDEIR contains no facts to explain that an increase in nighttime field use would not result in "substantial permanent increase in ambient noise levels in the vicinity". What would loudspeakers at night, bullhorns, and fans pounding on the proposed metal bleachers? What about the increased vehicle traffic noise during the day and night based on the new proposed parking lots?

How would the new viewing platform impact the increase of permanent noise levels especially throughout the neighborhood? How many people can this new viewing platform hold?

Include the noise exposures at the site and in the site vicinity evaluated against the standards of the Monterey County Noise Element, Ref. (b), which utilizes the Community Noise Equivalent Level (CNEL) noise descriptor.

In addition, include the noise exposures at the site evaluated against the standards of the State of California Code of Regulations, Title 24, Ref. (c).

What is the existing noise exposure around the facility during weekdays (school time), day games and events and then a benchmark of the anticipated differences with the including of the new viewing platform and new parking lots?

How does this project not interfere or violate the NOISE ELEMENT adopted by City of Carmel-by-the-Sea's General Plan has been prepared pursuant to Section 65302(g) of the California Government Code. Can you outline how this project doesn't violate the guidelines? Why not include all elements of The Noise Element which is composed of the following parts:

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Do you have an evaluation of the present and future noise climate in Carmel and the direct vicinity of the school?

Will you have a discussion of the major noise sources in Carmel and some suggestions for their control?

Why not add a section discussing the use of the Noise Element as a planning tool?

Can you a section summarizing actions which the City can take to reduce existing noise levels and avoid future noise problems?

A major objective of the Noise Element is to provide guidelines to achieve noise compatible land uses. As such, the Noise Element is most closely related to the Land Use, Housing, Circulation, and Open Space Elements. By identifying noise sensitive land uses and establishing compatibility guidelines for land use and noise, the Noise Element influences the general distribution, location, and intensity of future land use. This RDEIR is absent of any detail information that would allow for an informed decision making.

Under Table 2-1 Summary of Significant Impacts and Mitigation Measures Traffic

RDEIR recognizes that the "Impact 11-3. Construction Traffic Could Result in Safety Impacts When School is in Session" but 1). incorrectly underestimates and mis-categorizes mitigations measures as Less than Significant and 2) omits key areas of assessment. 3). Doesn't delineate what is Temporary versus address real permanent noises.

Mitigation Measure 11-3. The school district will prepare a Construction Management Plan prior to the commencement of construction preparation activities. However, this does not provide required information and detail necessary to make an informed decision of the validating of the mitigated measures. The school district should prepare a Construction Management Plan prior to the Final EIR for full transparency of the risks and intended mitigated measures.

The plan should include construction details include, but not be limited to, the following:

Provide how appropriate control measures, including barricades, warning signs, speed control devices, flaggers, and other measures will mitigate potential traffic hazards.

How does the school district intend to ensure coordination with on-site campus staff;

How will the school district prohibit heavy vehicle traffic to and from the project site during the hours when the majority of students are entering and exiting the campus;

How will the school district store construction equipment in a safe location during the construction phase of the project?

In addition, this section of Table 2-1 Summary of Significant Impacts and Mitigation Measure should include significant adverse implications to prosed photos of the new parking lots:

Parking Lot replacing Tennis Courts: Why is the entrance/exit right off of a residential street? Why is the entrance/exit not off Highway 1? What is the intersection and traffic flow measures of cars coming out of the baseball fields and merging with the new parking lot? Details are unclear and appear to be creating significant traffic challenges that do not currently exist on Morse Drive, a residential street.

Under Table 2-1 Summary of Significant Impacts and Mitigation Measures Traffic

RDEIR recognizes that the "Impact 11-4. An Increase in Event Attendance Could Result in Inadequate Parking During Limited Nighttime Events with Potential Emergency Access Issues" but 1). incorrectly underestimates and mis-categorizes mitigations measures as Less than Significant and 2) omits key areas of assessment. 3). Doesn't indicate or clarify what is school's jurisdiction and what is county's, Fire Marshall and/or local police enforcement responsibility.

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 but is incorrect that they have jurisdiction and can manage residential streets that are under the jurisdiction of the County and the County Laws and Regulations. The School district can outline and manage plans on their grounds but is in essence creating a traffic, safety and nuisance in the residential street that continue to escalate based on CUSD continued unplanned growth against the Performing Art Center, Swimming Pool and Baseball Batting Cages that did not follow any CEQA process or filed Notice of Exemption at any point.

IF the Carmel Middle School can be utilized for safe parking and safe traffic flow, then the alternative to build out additional stadium fields and proposed stadium lights should be executed at this location.

Provide a clear and easy to read chart of the parking situation. What is the total anticipated attendance and what is the gap on the Carmel High School?

How is the school district proposing to enforce the Traffic Management Plan? On August 27<sup>th</sup>, 2022 and attempt at off-school campus parking was trialed with disaster. Disaster include lack of coordination with Even Parking signs and conflict with existing parking signs. Execution was inconsistent, confliction and unclear.

NONE of the details of the Traffic Management Plan safeguard the residential streets surrounding the Carmel High School from traffic and parking overload that causes Significant and Unavoidable Impact to traffic, parking and safety. Emergency vehicles would not be able to pass and pedestrians would have a high rate of injury in the dark unlight streets surrounding the school.

These insights and request apply both equally to the streets west of Highway 1 and east of Highway 1.

A responsible mitigation measurement plan to prevent traffic and parking issues would be to install "No Parking - Residents Only" that would allow CUSD to safely implement a stronger Traffic Management plan.



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No Parking – Residents Only would have to be included in all streets.

Mitigation Measure 11-4 indicates: 174 Current Stalls, 76 propose stalls replacing the tennis courts and 35 more by baseball field for total of 285 stalls for up to 1500 or 2000 attendees: Appropriate mitigation measures include:

Alternative to build out Carmel Middle School that clearly has the footprint to safely incorporate all the necessary parking and keep the games/practices on-site. Cost and schedule of shuttle busses would not be necessary.

Clarify the math of how attendance is estimated. This RDEIR estimates 1500 attendees and the original DEIR estimated 2000 attendees. It's unclear what factors are going into the base of estimated attendance number?

What is the current student capacity at the school and what is the policy on the student/staff parking ratio?

Impact 11-4. Indicates An Increase in Event Attendance Could Result in Inadequate Parking During Limited Nighttime

Events with Potential Emergency Access Issues

Not enough level of information is provided factors directly relate to potential emergency access issues?

Provide more detail including but not limited to street measurements, traffic flow, differences of the conditions at daytime or nighttime? Do these conditions currently exist with day games and why or why not would they increase or decrease with nighttime events.

All Mitigation Measures in 11-4 a,b,c,d,e,f are not legally binding for enforcement and can be easily changed at the whim of ever evolving leadership at CUSD. Post the stadium improvements and installation of stadium lights there is no legally binding commitment to change the policy. The plan being presented is too complicated and each year a new flux of incoming students and parents have to be re-trained on the program. There is no evidence this can be successful. In fact, the one trial on August 27<sup>th</sup> was a disaster in parking, safety and inconsistent ticketing **EXHIBIT XX**

Mitigation measurements should be long-term and lasting and thus the alternative to build out the stadium needs and stadium lights are only viable at Carmel Middle School where enough land is available for safe parking and traffic flow.

INCONSISTENT Number of Parking Spaces Inconsistent between Draft EIRs:

Original Drafter EIR. EMC Planning Group Inc. Parking

At Carmel High School, 201 standard parking stalls are available for attendees of sporting events at the stadium. Available parking is distributed between two parking lots. The main campus parking located off of Ocean Avenue has 165 parking stalls and the second is located immediately south of the stadium and tennis courts next to the baseball diamond and includes 36 parking stalls. The main high school parking lot is also accessed directly off of State Route 1 via a right turn only access point at the south end of the parking lot. No traffic or parking control plan is in place at either parking area during large events. Additional parking spaces (approximately 22 spaces) is available to staff along the campus ring road along the north and eastern boundary of the campus along with approximately 15 parking spaces immediately north of the pool facility. Overflow parking occurs on surrounding public streets particularly along Carmel Hills Drive to the north of campus off Ocean Avenue and along Morse Drive to the south of campus.

At Carmel High School, 201 standard parking stalls are available for attendees of sporting events at the stadium. Available parking is distributed between two parking lots. The main campus parking located off of Ocean Avenue has 165 parking stalls and the second is located immediately south of the stadium and tennis courts next to the baseball diamond and includes 36 parking stalls. The main high school parking lot is also accessed directly off of State Route 1 via a right turn only access point at the south end of the parking lot. No traffic or parking control plan is in place at either parking area during large events. Additional parking spaces (approximately 22 spaces) is available to staff along the campus ring road along the north and eastern boundary of the campus along with approximately 15 parking spaces immediately north of the pool facility. Overflow parking occurs on surrounding public streets particularly along Carmel Hills Drive to the north of campus off Ocean Avenue and along Morse Drive to the south of campus.

: A 2018 IS/MND prepared for the acquisition of the 8.23-acre parcel immediately adjacent to and west of Carmel Middle School to use for additional athletic field, identified the following species as having the potential to occur in the vicinity of the middle school site: California red-legged frog (*Rana draytonii*), California tiger salamander (*Ambystoma californiense*), Monterey dusky-footed woodrat (*Neotoma macrotis luciana*), Townsend's big earedbat (*Corynorhinus townsendii*), and nesting birds (EMC Planning Group 2018). Biological mitigation measures were identified in the 2018 IS/MND which addressed protection of California red-legged frog and California tiger salamander along with Portable lights

#### TRANSPORTATION/PARKING (OVERVIEW)

SECTION 1: Environmental Settings are Not Accurate and Inclusive of Fire and Safety Challenges.

The 22-acre Carmel High School campus is geographically land-locked for any additional growth surrounded by the protected corridor of Scenic Highway on the west side, protected wetlands of Hatton Canyon Park on the east side and residential communities in the surrounding areas. The campus has experienced historic and chronic challenges of effectively managing transportation,

parking, and vehicle flows, thus jeopardizing fire and life safety. This has been on-going for years and yet, the school district continues to expand activities and construction projects on the campus versus demonstrating long-term vision of investing at CMS for appropriate and responsible growth.

We also contend that CHS's growth over the past several years has been irresponsible and now calls into question the safety of the campus. Emergency Access Routes are not publicly available and there are daily activities that risk the lives of those on the campus.

SECTION 2: Environmental Impact Doesn't Move to Less than Significant with outlined Mitigation Measures Impact 11-4. An Increase in Event Attendance Could Result in Inadequate Parking During Limited Nighttime Events with Potential Emergency Access Issues: Significant  
We disagree that Mitigation Measure 11-4 will move the Environmental Impact to Less than Significant. It remains at Significant and Unavoidable  
The outlined Traffic Management Plan (TMP) in Appendix K is not reliable, has no basis for success, adds to the VMT (thus doesn't meet a sustainability goals) and is not enforceable legally or a long-term solution. In addition, the district continues to ignore the request they provide Emergency Access Routes.

The Traffic Management Plan (TMP) is insulting to the community as a short-term band-aid attempt to pass the approval of the stadium lights. If in fact the TMP was valid on any level, the district should be held accountable to apply this TMP to the daily challenges of the campus which they can't seem to resolve.

SOLUTION: Carmel High School is Limited in Growth Potential with Carmel Middle School Poised for the Future.

**SECTION 1: FEEBACK ON ENVIRONMENTAL SETTINGS FOR TRANSPORTATION/PARKING**

Given the Environmental Setting lays the baseline physical conditions by which a determination can be made about an impact and its significance, the RDEIR is missing several key factors regarding the location and physical setting of Carmel High School.

The below baseline conditions are critical inputs that provide an understanding of the Significant and Unavoidable Impacts of the proposed project will have on transportation, parking, energy and greenhouse gas emissions.

CUSD has inaccurately underestimated the need for any mitigating measures. In addition, the impacts would remain Significant and Unavoidable given any solutions focused on Carmel High School would not be solvable given the CHS campus is geographically land-locked at 22 acres and any further build-out continues to jeopardize the safety of those on the campus. By focusing ANY solutions at Carmel High School, the negative impacts on the Environment would jeopardize human safety and emergency vehicle access solutions.

Be transparent and inclusive to acknowledging the facts below and respond to the questions, comments where applicable.

**CHS CAMPUS IS BUILT AT CAPACITY**

CHS: Established in 1940's, Carmel High School's 22-acre campus (page 46) barely meets the required 33.5 acres for a high school of its size enrollment as recommended by the [The California Department of Education](#) in "Guide to School Site Analysis and Development. The growth of the campus is land-locked and limited because it is surrounded by protected Scenic Highway 1 to the west and residential neighborhoods from all remaining locations.

CMS: Since its purchase in 1963, Carmel Middle School's 66-acre campus site was always intended for the future Carmel High School. In 2018, CUSD acquired a 8.23-acre parcel adjacent to Carmel Middle School and the 2019 CUSD Facilities Master Plan clearly visualizes the potential of SIX (6) athletic fields with lights.

A Carmel Pine Cone Article dated January 10<sup>th</sup>, 1963 captures the original vision of growth:

"by reason of location and intended future use, it looks outward, towards, Carmel Valley, away to the north, west, towards Carmel's burgeoning suburbs, but not towards the venerable and again heart of the system, Carmel itself...It is a school of the future, both in orientation and use. For according to plans, it will one day be a senior high school and the present plant, at Ocean Avenue and Highway One, will become one of two junior high schools, the other being eventually situated up in the valley.

What are the CA standard guidelines and recommendations of CHS campus size to student enrollment / staff ratio? How does that compare with other schools on the Monterey Peninsula?

What is the long-term student enrollment projections at CHS?

What is the assessment of post Covid environment given the significant migration of Bay Area residents moving to Carmel? How will a limited high school campus at the current location absorb the growth?

The school's budget is driven by taxes, isn't there a 3-year trend growth since 2019? Aren't tax revenues up with continued increase of population?

What will be CUSD's role be in accommodating the new housing Rancho Cañada Village housing development in Carmel Valley? What is the number of housing units predicted and what was the school's input into their final EIR? How is CUSD planning to accommodate this student growth? Is this growth being considered in the VMT, CUMMULATIVE IMPACTS, Etc. More students closer to CMS impacts long-term VMT, energy, etc.

How are you managing student enrollment growth and budget investments comparing CHS vs. CMS?

**LACK OF AVAILABILTY OF PARKING (also determined by campus size)**

CHS: Carmel High School lacks any adequate parking spaces for the current study body and is more than 50% under the recommended allotment of the CA Department of Education.\* The RDEIR has not provided a consistent and accurate snapshot in the baseline regarding current parking capacity in order to build a solid foundation of how they would safely absorb the increased attendees to athletic events. The RDEIR provides conflicting total number of on-campus parking spaces for Carmel High School which puts into question the accuracy of any factual outputs into the final traffic and transportation analysis

DEIR: 238 Parking Spaces at CHS

RDEIR : 276 Parking Spaces at CHS

As described in the \*California Department of Education in "Guide to School Site Analysis and Development" "Secondary schools generally provide additional land for student parking. This provision allows

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students who drive cars to park on the school site rather than occupy street parking throughout a neighborhood...In the past many school districts provide student lots with a minimum parking capacity calculated on 50 percent of the school enrollment. Thus, a high school of 2,000 students would provide parking for 1,000 cars at 380 square feet per car - an area of 380,000 square feet or about 8.7 acres of land - in addition to the space needed for staff and visitor parking.

A high school like Carmel with 866 students should be providing parking for more than 433. In addition, the RDEIR needs to provide further calculations for square feet/acres of land dedicated to parking with references to an official site or reference of guidance. The reality is the campus is land-locked and expansion of additional parking spaces is at the expense of other educational needs (trade-offs need to be considered as a whole - new parking can't be added without negative implication to taking something away).

In contrast, Carmel Middle School even without new construction has approximately 400 parking spaces (page 287). In addition, with proper planning for long-term growth, CMS has the highest probability of success planning to meet the parking requirements of the California Department of Education in "Guide to School Site Analysis and Development". Note how many times the CMS campus is cited as a solution to parking.

You admit that CMS is better suited to absorb any potential increase in the need for parking stalls, so why isn't CMS a better location to invest in for growth and long-term viability of new athletic fields vs. CHS? Explain?

Even if the proposed new parking lots were approved and built, CHS would still face an overflow challenge in meeting any demands daily or at any sporting events:

CHS would lack approximately 341 parking spaces (gap) = (617 demand - 276 available)

CMS would be better positioned to absorb any outlined parking space demands at approximately 218 parking space (gap) = (617 demand - 199 available - 200 overflow parking spaces)

What are CHS's plans for encouraging walking and public transportation to school daily and at sporting events?

What is CHS's current parking policy for the students and staff?

CHRONIC HISTORY OF UNSOLVED TRAFFIC, PARKING AND SAFETY ISSUES SURROUNDING CHS & RESIDENTIAL

While adequacy of parking alone is not within the purview of CEQA impacts, secondary impacts on the environment that result from a parking deficit are within the scope of CEQA. CUSD Leadership and CHS Principals (current and previous) are more than aware of secondary impacts on the environment that currently exist and is misleading the narrative of the RDEIR and underestimating future implications by encouraging future growth at CHS.

To imply that Significant Impacts have reduced to a Less-than-Significant with Mitigation Measures under Transportation Impact 11-4 is false.

A more accurate picture of the secondary impacts on the environment that is a result from the CURRENT parking deficit would be to look at the conditions of Highway right in front of the school. A description is cited below:

California transportation officials list this stretch of Highway 1 as: "one of the most heavily traveled two-lane highways in the State." 7 SAR 2083.1 This section of Highway 1 is also dangerous: the rate of traffic accidents in this two-lane section of Highway 1 exceeds the state average. 24 SAR 7652. In 1990, traffic reached an average of 40,000 cars per day and an average of 60,000 cars per day at one location on this stretch. 24 SAR 7650.

[SOURCE LINK HERE:](#) CITY OF CARMEL-BY-THE-SEA; Monterey Peninsula Regional Park

District; Hatton Canyon Coalition; Sierra Club,

Plaintiffs-Appellants, v.

UNITED STATES DEPARTMENT OF TRANSPORTATION; Admiral James

Busey; Federal Highway Administration; Thomas D. Larson;

California Department of Transportation; James Van Loben

Sels; Thomas L. Pollock; et al., Defendants-Appellees.

Additional References Capturing the State of Highway 1, current traffic and safety issues that intersect with CHS are below. CUSD continues to add aggravations to the situation (in essence creating a legal nuisance situation for the community). CUSD has been irresponsible in acknowledging or problem solving they conditions they've created:

[Girl, 16, hits pedestrian near Carmel High School: 1 dead](#)

The Sandpiper articles on traffic and parking challenges:

[Large junior class poses parking problem for Carmel High School](#)

Published Dec. 15, 2021, BY FLINT NACHBAR

[Juniors, sophomores battle for prime parking spots](#)

[Juniors race for scarce parking spots](#)

Can you provide current Emergency Access Routes for the entire CHS Campus? Shouldn't safety be the highest priority?

Can you provide how any new proposed construction would impact the Emergency Access Routes?

Can you provide historical record of the traffic and parking challenges that residents have complained about over the number of years to help determine if you have a fundamental benchmark problem?

Why not include a record of parking violations within the 1 mile radius over the past five years (COVID years don't count)?

Can you outline any official "School Zone Safety Calming Programs" in place now or in the future?

EMERGENCY ACCESS ROUTES: FIRE AND LIFE SAFETY

Carmel Unified School District has not been transparent in sharing required Emergency Access Routes and how Emergency Vehicles are intended to respond to an emergency (currently or in the future with any of the proposed plans). CUSD has a history of moving forward with construction plans that don't include the community input or provide an environmental impact review.

On February 8<sup>th</sup>, 2008, in a School Board Resolution 08-08 ([Find on your own website & CPRA Requests](#)), CUSD declared itself exempt from a CEQA process from significant new construction. A Notice of Exemption

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was never signed or filed by Carmel Unified School Board and the public was never engaged, informed or included in the process of understanding the Environmental Impacts that this new construction would bring to the campus and the surrounding community. The new construction included significant new plans for a theater center with close to a \$8 MM construction plan and new swimming pool for close to \$2.5 MM.

On October 15<sup>th</sup>, 2019 in a School Board Resolution 19-37 (Find on your website & CPRA Request), CUSD declared itself exempt from a CEQA process from improvements at the Baseball Practice Area (new batting cages). A Notice of Exemption was never signed or filed by Carmel Unified School Board and the public was never engaged, informed or included in the process of understanding the environmental impacts of this new construction would bring to the community. The noise pollution has been a consistent complaint back to CHS (they have records and should share publicly). In addition, CUSD again did not seek DSA approval and we believe they are covering their tracks with a recent request for a Contract Request Approval on 09/14/2022 - 5:30 PM - Regular Meeting for Whitson Engineer. [LINK HERE](#).

CUSD appears to have CONSISTENTLY failed to facilitate the Division of the State Architect's (DSA) fire and life safety plan review of project site conditions, consisting of construction of new building(s), and additions to existing buildings. None of the DSA projects (Attachments XX) included an 801 Form designed for fire department emergency vehicle access.

Provide current and proposed Emergency Access Routes.

Be specific to the entire campus including the baseball field that is part of the athletic scope.

Why is CUSD focused on short-term band-aid solutions versus long-term reliable and credible solutions?

Long-term Viable Solutions that address the crux of the problem vs covering it up:

Why isn't TMP focus both on the East side and West Side of Highway 1, not just the surrounding neighborhood behind the High School as indicated on the map?

Shouldn't TMP be viable and credible in the day-to-day workings of CHS? We think that is broken too.

Why can't CUSD facilitate a working group with Monterey County Public Work leaders for a permanent long-term that might include a "Residents Only Parking" and provide relief and protection for the residents? CUSD is causing the problem?

Why is the RDEIR Mitigation Measures are based on Worst-case, Maximum Spectator Attendance Scenario - Homecoming/Rivalry Football Games? The following inputs are not credible, do not have verifiable sources and/or readily admits the current facility is woefully over capacity and attracting any new attendance should be undesirable:

Attendance Assumption:

Original DEIR: Estimates 2,000 Attendees (also in Appendix K)

RDEIR: Reduces estimate to 1500 Attendees

What factors went into the base change of estimated attendance?

Given game attendance is free to sporting events, how are any estimates accurate?

How are students and parents from visiting schools accounted for?

Admitted over Capacity of Stadium at baseline:

Total current stadium capacity is 1,081 (home bleachers 991 and visitors 90) and "attendees stand or bring their own chairs" (Page 57).

Admitted Gap of Parking Capacity (Page 33) even with faulty inputs:

CHS is approximately 341 IF new parking gets approve (617 demand - 276 available)

CMS is approximately 218 (617 demand - 199 available - 200 overflow parking spaces)

#### 11.1 ENVIRONMENTAL SETTING

The FIRST DEIR: Caltrans, District 5 (dated May 26, 2021), 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.

Pursuant to Senate Bill (SB) 743, the California Environmental Quality Act (CEQA) 2019 Update Guidelines Section 15064.3, subdivision (b) states that VMT will be the metric in analyzing transportation impacts for CEQA purposes. VMT is the total miles of travel by personal motorized vehicles a project is expected to generate in a day. The VMT Assessment and Intersection Operations, Site Access and Parking Evaluation for the Proposed Carmel High School Stadium Lighting in Carmel-by-the-Sea, California prepared for the proposed project by Hexagon Transportation Consultants (2022). APPENDIX J is fundamentally flawed in the following ways:

The transportation study solely focused on the potential impacts resulting from the Friday evening football games. It does not include all the other referenced athletic teams.

Due to pandemic conditions, there were no scheduled high school football games in the surrounding region for which observations of carpooling activity could be collected. Therefore, their analysis utilized a vehicle occupancy rate based on data previously collected for a homecoming football game on a Friday night at Mitty High School in San Jose, California. There are NO specifics on how Mitty High School is similar to Carmel High School and or the surrounding environment settings. How was this location chosen? How is it similar to Carmel High School? This was a completely random selection that had no bearing to our location.

The County of Monterey and the Transportation Agency for Monterey County (TAMC), at the time of the report, have not yet adopted any analysis procedures, standards, or guidelines consistent with SB 743. In the absence of an adopted, or even draft, policy with numeric thresholds, this assessment relies on guidelines published by the Governor's Office of Planning and Research (OPR) in analyzing the project's effects on VMT. Thus, the margin of Traffic conditions were observed during the PM peak hour of traffic on a Friday evening (June 11, 2021) when school was out of session and not during any existing athletic games.

Given the ongoing COVID-19 pandemic and its effect on normal traffic patterns, the evaluation of operations along SR 1 in the project vicinity relied on traffic data and analysis completed on a dated report from 2017 that was not even included as a reference point:

The Rio Ranch Marketplace Traffic Impact Analysis (Keith Higgins, December 29, 2017) indicates that SR 1/Ocean Avenue operates at a Level of Service (LOS) C during the standard PM peak-hour based



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on counts collected on May 25, 2017.  
With limited stadium capacity, landlock campus size, challenges with surrounding traffic and limited parking why is growth continued to be focused at CHS vs. CMS?  
What would one athletic field at CMS school cost for the appropriate parking and bleacher capacity?

Statement from your report: All varsity football games would have the ability to be hosted on the Carmel High School campus on either Thursday, Friday, or Saturday evenings depending on officials' availability.  
What is the exact estimate of current baseline attendees (no transparency of how the current inputs are identified) and what is the projected potential.  
Why can't the VMT and estimate attendees be re-done with more relevant data and specific inputs?  
How would new and relevant data feed into the VMT analysis and what would be the cumulative impact to the surrounding neighborhood?

**GOAL: Minimize risk of harming Special Status Species with Potential to Occur in Vicinity**

In the NOP (Page 28) You stated: 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.  
In the RDEIR, you don't breakout what are the eight species? Can you provide the break-out in word form? You provide a visual map: Figure 7-2 Special-Status Species (Page 203) with Potential to Occur in the Project. Can you drill down with words on what that map means (similar to the Special Plant Species on page 205) so we can understand the accuracy?

In the NOP, CDFW (June 14<sup>th</sup>, 2021) point blank said you need to address 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

Other comments received from neighbors of the high school addressed possible biological impacts to the adjacent Hatton Canyon area. These comments are addressed in this section of the EIR. comments regarding light and noise impacts on wildlife.

**GOAL: Minimize risk of harming Special-Status Plant Species with Potential to Occur in Vicinity**

In the NOP, CDFW (June 14<sup>th</sup>, 2021) point blank said you need to address potential impacts to special-status plants, including

Hickman's onion (*Allium hickmanii*)  
Monterey clover (*Trifolium trichocalyx*)

In the NOP, CDFW recommended consulting with the USFWS on potential impacts to federally listed species including, but not limited to California red-legged frog. Take under FESA is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with FESA is advised well in advance of any ground-disturbing activities.

Was the above done?

In addition, the DEIR has declared "Significant and Unavoidable Light Pollution AND Visual Impacts even AFTER Mitigation Measures (Page 35). IF CUSD decides to move forward, a Declaration of Overriding Conditions must be signed and filed by the School Board. The Statement of Overriding considerations shall be supported by Substantial evidence in the record.

How can the CUSD School Board fairly evaluate the light pollution if they haven't visited the public open spaces at Carmel Views

1). Accurately show the entire impacted geographical impact area in your assessment study – don't limited to a narrow geographical area adjacent to Carmel High School.

QUESTION: Why not Include wider community impacts: Carmel-by-the-Sea, Carmel Valley, Jacks Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve in each of the Environmental

Settings (Aesthetics, Air Quality, Biological Resources, Energy, Greenhouse Gas Emissions, Noise, Transportation and Parking, Recreation). Then extrapolate Analysis, Impacts and Mitigation Measures to accurately represent our community.

QUESTION: Why can't you Extend Figure 5.1 Viewshed analysis beyond 3.5 miles to include all the fully impacted areas so we can see full damage?

QUESTION: Why can't you include Figure #14 of GMP-3.3 The Greater Monterey Peninsula Scenic Highway Corridors and Visual Sensitivity Map as an Appendix. Specifically, breakout the details of how the 4.2 Project Characteristics impact each sensitive area. We need to see the depth of the sensitivity to understand depth of environmental impact.

The EIR must identify an environmentally superior alternative than NO PROJECT, below is an Alternative that is environmentally superior, supports students, provides cost savings and is future in thinking:

ALTERNATIVE SOLUTION: BEST ENVIRONMENTAL, MOST STUDENT SUPPORTIVE, MOST COST SAVINGS

Say NO to Stadium Lights: Causes Significant and Unavoidable Outcomes with no real mitigation measures

Repair the Tennis Courts: Supports Tennis Students, Community Usage and Saves Demolition Dollars

Fix the light pollution associated with the swimming pool lights

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Shift stadium light funds to transportation solutions like busses that will supporting Late Start.

Re-start the CEQA process for the larger newer projects including the 18-foot roadway and parking lots

Properly assess the opportunity for growth at Carmel Middle School (a 60+ acre campus) with more than 6 athletic fields already identified for build out in the CUSD 2019 Facility Master Plan.

You provide: Table 4-3 Proposed Stadium and Pool Facility Lighting Schedule

There are significant overlaps when the stadium and pool lights will be on together, yet you provide no cumulative impacts of the combination of the light pollution together.

All of Appendix C has to be re-done when both facility lights are on. This should include light spills, etc...

More Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been [determined by lighting experts](#) to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from Pine Hills Dr at 5:48pm ([see pic here](#)) and Outlook Dr at 6:21pm ([see pic here](#)).

Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 124 games each year that will use the lights. This is practically every day of the school year, so additional mitigations are not just needed but absolutely critical to preserving the scenic vistas and visual character of Carmel:

Disallow lights usage on weekends for any use, period.

Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

The RDEIR does propose a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say, and overrule if necessary, for any alterations to the lights usage policy in the future.

The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see [these recommendations for Wellesley High School stadium lighting](#). So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be "Less than significant", due to significant errors/omissions, as well as selective bias in the data used.

The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games [peaking over 80 dB at Waunakee HS](#) and [over 100 dB at college games](#). The noise analysis in the RDEIR is incorrect and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

RDEIR dismisses noise as a significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 L<sub>dn</sub> or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 L<sub>dn</sub> standard and much less than the likely expected noise levels for games (discussed in item 3A).

The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This has been seen already during current Saturday afternoon football games ([see pic here](#)). As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate local regulations. These regulations were



designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them even if it has the authority to do so.

The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 ([see map image here](#)), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 ([see map image here](#)). Why is this project allowed to violate this this Monterey County regulation?

The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

#### 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to meet all major project objectives while also avoiding all impacts.

Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be corrected to show that its impacts on both traffic and light will be significant lower than at CHS.

Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (more cars than on Carmel Valley Road) and residential neighborhood (more homes than around CMS).

CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >420-ft. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce all of the many significant impacts of this project, so we strongly oppose allowing this project to move forward.

Copies to

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## Response to Letter 159a, Concerned Carmel Residents

1. This comment is an unorganized compilation of comments provided in other comment letters/emails, whose comments have been addressed in previous responses, mostly in Letters 14-1 a through 14-7-1 (total of 157 emails from one person). A reasoned and thorough response to this Letter has been made in good faith, however it should be noted that a response to this Letter is cumulative to other responses, and should be read together with the RDEIR and administrative record as a whole. This letter does not raise any new environmental issues that have not already been raise and addressed in previous letters and responses. It should also be noted that this Letter intermittently references or requests various documents; however, none of those documents have been included in this response, except those for where a link was provided. The school district, as the Lead Agency, is the recipient of comment letters and it is outside its purview to add to comment letters received, and is unable to speculate what the commenter is requesting here. The following responses are organized by topic.

Regarding the original draft EIR, size of the RDEIR, California Public Records Act requests, CUSD's leadership, economics and taxpayer dollars, no environmental issue is raised and therefore, no response is necessary. Alleged economic and social effects are not related to a physical change. (CEQA Guidelines, §§15151(a) & 15358(b).) With respect to CPRA requests and responses, please also refer to response to comment 4 of Letter 14-4-m.

Regarding the project description (including stadium lights, new parking lots, retrofit of existing stadium lights, storage building, etc.) and project objectives, see Section 4.0, Project Description of the RDEIR, for a discussion of the proposed project components and the associated project objectives.

Regarding significant and unavoidable impacts, the RDEIR identifies after dark lighting and sky glow as a significant and unavoidable environmental impact. Mitigation measures are presented to limit the number of days and hours the lights would be used, but the impact is still significant and unavoidable. Please refer to Section 5.0, Aesthetics, of the RDEIR. Please also refer to response to Letter 2b, comment 2.

Regarding past projects at the campus, they are not part of the project description or within the scope of the RDEIR, and therefore, no response is necessary. Please also refer to response to Letter 10c, comment 3. Similarly, other high schools are outside the scope of the RDEIR.

Regarding transportation, parking, and emergency access, see Section 3.0, Environmental Setting, Section 4.0, Project Description, and Section 11.0, Transportation and Parking of the RDEIR, as well as response to Letter 2b, comment 3, Letter 14-1-m, Letter 14-1-k, and Letter 14-2-f.

Regarding light pollution, see Section 5.0, Aesthetics, of the RDEIR, as well as response to Letter 2b, comment 2, and response to Letter 114b.

Regarding attendance at evening games, see Section 4.0, Project Description of the RDEIR. The school district anticipates additional spectators at evening games, the increase of which is evaluated in the RDEIR. Please also refer to responses to Letter 14-6-v, comment 9 and comment 11.

Regarding conducting CEQA on each project component independently, the intent of CEQA is to evaluate the proposed project as a whole, and not in individual parts. (CEQA Guidelines, §15378(a).)

Regarding impacts to wildlife, see Section 7.0, Biological Resources of the RDEIR, as well as response to Letter 131 from the California Department of Fish and Wildlife.

Regarding local policies, zoning ordinances and regulations, and consistency with them, see response to Letter 2b, comment 4.

Regarding the timing of the scheduled special board meeting for consideration of the project and the EIR, the board must consider and certify the EIR prior to taking action on the project. Regarding putting off the decision until re-districting efforts are complete, there is no requirement for the school district to wait for redistricting to be completed. The Carmel Unified School District Board of Education adopted the redistricted map on October 19, 2022 with Resolution 22-17. Moreover, the end result of such efforts are outside of the scope of the RDEIR and are not considered baseline conditions. No environmental issue is raised and therefore, no response is required.

Regarding the CEQA process, including preparation of the RDEIR, the school district and consultants complied with the requirements of CEQA and its implementing Guidelines in noticing, public engagement, preparation of the EIR. The commenter quotes various sections of the CEQA Guidelines, but does not specify how the school district did not comply with those Guidelines. For more information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. With respect to notice provided to public agencies, please see response to Letter 14-3-m, comment 1. Concerning the NOP, please see responses to Letter 14-4-a, comment 1, and Letter 14-2-c, comment 2.

Regarding alternatives, include the alternative of construction a lighted stadium at Carmel Middle School, see Section 18.0, Alternatives of the RDEIR, as well as response to Letter 2b, comment 5; and Letter 2c, comment 22.

Regarding demolition of the tennis courts, see Section 4.0, Project Description of the RDEIR. The environmental impacts of demolition of the tennis courts and construction of a parking lot are addressed throughout the RDEIR.

Regarding Late Start, Late Start is a project objective, it is not part of the project description. See also response to Letter 192.

Regarding Late Start and alternatives, see Section 18.0, Alternatives of the RDEIR.

Regarding the assumption in the project description that more people would attend evening games compared to Saturday games, projected attendance is based upon the experience of the school's athletic department faculty, and is discussed in detail in Section 4.0, Project Description, pages 4-34 and 4-35, and summarized in Table 4-4. See also responses to Letter 2b, comment 1, and Letter 14-2-d.

Regarding the costs of the proposed project, this is not an environmental issue and therefore, no response is necessary. Please also refer to response to Letter 14-1-g, comment 3.

The questions regarding parking capacity and lighting at Pacific Grove High School, Seaside High School, and Monterey Peninsula College, see Section 11.0, Alternatives, for a discussion of the alternatives at Pacific Grove High School and Monterey Peninsula College. Please also see response to comment 1 to Letter 14-2-e. Regarding using Seaside High School as an alternative, the impacts associated would be the same as using Pacific Grove High School or Monterey Peninsula College and therefore, evaluating Seaside High School as an alternative is not necessary. The commenter has failed to identify any evidence that this proposed alternative is necessary to informed decision-making or is either feasible or environmentally superior to alternatives studied in the RDEIR. The RDEIR included a reasonable range of alternatives, as required by CEQA. Please also see response to comment 4 to Letter 14-1-g. Regarding costs, costs are not an environmental issue and therefore, no response is necessary. Please also refer to response to Letter 14-1-g, comment 3.

Regarding existing parking spaces, see Section 3.0, Environmental Setting, including Figure 3-6, On-Campus Parking Spaces.

Regarding the differences from the original DEIR to the RDEIR, the original DEIR was prepared to address concerns raised by the public, as well as to make minor corrections. For more information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. No environmental issue is raised and therefore, no further response is necessary.

Regarding the assumed persons per vehicle, see Section 11.0, Transportation and Parking, and Appendix J of the RDEIR for a full discussion of the methodology used to project persons per vehicle. Please also see response to Letter 14-3-j, comment 1.

Regarding parking in the neighborhoods west of State Route 1, see response to Letter 2b, comment 3, and Letter 14-1-q, comment 1.

Regarding traffic impacts on the elderly care facilities on Morse and Flanders, see Section 11.0, Transportation and Parking of the RDEIR. With the addition of 111 on-campus parking spaces and preparation and implementation of a Traffic Management Plan for highly attended events, there would be no impact to available parking at the elderly care facilities, or anywhere in the surrounding neighborhoods.

Regarding scoping sessions and the notice of preparation, see response to Letter 2c, comment 3, Letter 14-4-a, comment 1, and Letter 14-2-c, comment 2.

Regarding using the outdoor amphitheater for parking, see response to Letter 14-3-c.

Regarding using the existing baseball field for parking (temporary or permanent) see responses to Letter 14-2-o, comment 2, Letter 14-1g, comment 4, and Letter 13b, comment 2.

Regarding a vehicle miles traveled (VMT) assessment, see Section 11.0, Transportation and Parking in the RDEIR for the VMT assessment. Please see response to Letter 14-3-a, comment 1.

Regarding comments from Caltrans and TAMC, their comments were addressed in the RDEIR. Neither agency commented on the RDEIR. Please refer to response to Letter 14-2-j.

Regarding air quality, energy, and greenhouse gas emissions associated with the proposed project, see Section 6.0, Air Quality, Section 8.0, Energy, and Section 9.0, Greenhouse Gas Emissions of the RDEIR.

Regarding “residents only parking”, this does not raise an environmental issue. However, the school district is not opposed the resident only parking in the surrounding neighborhoods; however, the school district has no authority to implement this. It would be the responsibility of the County of Monterey. Please refer to response to comment 5 of Letter 5.

Regarding an encroachment permit from Caltrans, when necessary, the school would obtain an encroachment permit; however, this comment does not raise an environmental issue and therefore, no response is necessary. Please see responses to Letter 14-2-s, comment 1, and Letter 14-2-y, comment 1.

Regarding the green building objective, see response to Letter 2b, comment 1.

Regarding the proposed storage building with the viewing platform. This is part of the project description (see Section 4.0, Project Description in the RDEIR) and its environmental impacts are addressed throughout the RDEIR. Please refer to response to Letter 14-2-k, comment 1.

Regarding the objective to create new, healthy weekend social opportunity for District students while building school spirit, see response to Letter 2b, comment 1, Letter 132b, comment 8, and Letter 14-2-d. The comments regarding mental health and wellness programs and sexual harassment are not regarding the proposed project and do not raise an environmental issue. These alleged issues are outside of the scope of the RDEIR and the CEQA process. Therefore, no response is necessary.

Regarding the 2019 facilities master plan, the proposed project does include some components of the plan at Carmel High School including stadium lights, the storage building and viewing platform, and the parking lot replacement of the tennis courts, the environmental effects of which are addressed through the RDEIR. Please also see response to Letter 14-1-p.

Regarding the proposed project budget and general obligation bonds and other financial resources, this is not an environmental issue and therefore, no response is necessary.

Regarding choosing Musco as a consultant, see response to Letter 63b, comment 2 and Letter 114b, comment 2.

Regarding the comment about the proposed increase in the number of games, the proposed project does not include increasing the number of games played at Carmel High School with one exception. The JV soccer games are currently played at Carmel Middle School. With implementation of the proposed project, those games would be played at the high school. See Section 3.0, Environmental Setting, and Section 4.0, Project Description of the RDEIR for additional details.

Regarding cumulative light pollution from the existing (and to be retrofitted) pool lights along with the proposed stadium lights is addressed in Section 4.0, Project Description, Appendix C, and Section 5.0, Aesthetics of the RDEIR. Please also refer to response to Letter 14-1-r, comment 6.

Regarding impacts to scenic highway 1, see Section 5.0, Aesthetics, of the RDEIR. The specific lighting impacts of both the new parking lot (tennis court location) and the stadium lights is depicted in Figure 5-13b, which simulates the parking lots with cars and lights, as well as the stadium lights. Please refer to response to Letter 22g, comment 2.



Regarding improvements at the baseball field, the proposed project does not include improvements at the baseball field. Please refer to response to comment 14-1-g, comment 1.

Regarding the noticing requirements of the RDEIR, the notice of availability of the RDIER was sent to all agencies and other parties as required by CEQA Guidelines 15087. Public Review of Draft EIR. A comprehensive list is part of the administrative record for the project. Please see response to Letter 14-3-m, comment 1.

Regarding the potential loss of trees, see Section 7.0, Biological Resources, including the applicable mitigation measure. Please refer to Letter 2b, comment 4.

Regarding the reiteration of the entire impacts table in the RDEIR summary, CEQA requires EIRs to include a summary of significant impacts. (Pub. Res. Code, §21100(b)(2)(A); CEQA Guidelines, §§15126(b) & 15126.2(b).) The details of the environmental analysis and associated impacts and mitigation measures are included in the appropriate sections of the RDEIR. The summary is a summary only of the impacts.

Regarding compliance with the National Environmental Policy Act, NEPA is applicable to federal projects and projects that are receiving federal funding. NEPA does not apply to the proposed project. The project is analyzed under CEQA in accordance with applicable law.

Regarding the biological resources mitigation measures, these are the measures that are recommended and accepted by the California Department of Fish and Wildlife. Please see further discussion in Section 7.0, Biological Resources, of the RDEIR. See also response to letter 131 from the department.

Regarding noise, see Section 10.0, Noise of the RDEIR, Appendix A of this final EIR and responses to Letter 72j and 72 k, and Letter 96.

Regarding the mitigation measure for a construction management plan, the mitigation measure includes sufficient performance standards for preparation of an effective construction management plan in accordance with industry standards. Please refer to discussion in the RDEIR regarding Impact 11-3 and Mitigation Measure 11-3.

Regarding implementation of the Traffic Management Plan, see Section 11.0, Transportation and Parking, as well as response to Letter 2b, comment 3.

Regarding current student capacity, the proposed project would not increase student capacity. See page 17-1 of the RDEIR. This comment does not raise an environmental issue and therefore, no response is necessary.

Regarding implementation of mitigation measures, mitigation measures adopted by the school district board are legally binding. (See Pub. Res. Code, §21081.6(b); CEQA Guidelines, §15126.4(a)(2).)

Regarding the IS/MND prepared for the acquisition of property at the middle school, past projects and related CEQA processes are outside the scope of the RDEIR. Please see response to Letter 14-1-h, comment 4.

Regarding Carmel High School built at capacity, the proposed project does not include any components that increase the student population, or increase the size of the campus. See page 17-1 of the RDEIR. All proposed changes are within the boundaries of the current campus. Please refer to Section 4.0, Project Description, of the RDEIR. Therefore, no response is necessary.

Regarding the accident history on State Route 1, see response to Letter 14-1-k and 14-5-3.

Regarding projects that are exempt from CEQA, preparation of and filing a Notice of Exemption is not required. Please also see response to Letter 14-1-h, comment 3.

Regarding using the maximum attendance events to evaluate transportation impacts, using an event when attendance is not the highest, would underestimate the project's impacts. See response to Letter 14-3-a, comment 1.

Regarding impacts to special status species as required by the California Department of Fish and Wildlife in their response to the NOP, Section 7.0, Biological Resources, addresses impacts to special status species. Please also see response to Letter 131.

Regarding Appendix C and an evaluation of both the pool lights and the stadium lights being on at the same time, see Appendix C and response to Letter 14-2-m. See also Section 5.0, Aesthetics, for the visual impact analysis addressing both sets of lights on at the same time. Appendix C and the RDEIR do not need to be revised.

Regarding lighting impacts at Wellesley High School, see response to Letter 2b, comment 2.

Regarding noise at Waunakee High School in Wisconsin, see response to Letter 2b, comment 3.

No changes to the RDEIR are required.

From: **ConcernedCarmel Residents** <[concernedcarmelresidents@gmail.com](mailto:concernedcarmelresidents@gmail.com)>  
Date: Sat, Oct 8, 2022 at 11:46 AM  
Subject: RDEIR Feedback MPC as viable alternative  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1 | The RDEIR referenced an e-mail from MPC that there is no flexibility and/or availability for CHS to use MPC as an alternative, yet, why does this e-mail indicate that Wendy Bates said "renting the MPC Facility is certainly something we can attempt to work out you"?  
Why haven't you followed up for more detailed information on what that alternative would mean?  
Aren't the lights, facilities and campus at MPC better in standards of size, safety etc?

2 | Table 4-2 Proposed Schedule of Stadium Uses (After Installation of Field Lights) says you need lights for all these CUSD's Fall Sports (*August to November*) and Winter Sports (*Nov - February*) and Spring Sports (*February - May*)? ***Is that correct? You will be using lights for all the outlined times and sports on this proposed schedule?***

3 | If that is the case, why is the email only inquiring about MPC's run from *November - February*? ***Shouldn't Golden Anderson have asked for options and alternatives for all the potential meets/practices that use the lights? Isn't that what we are trying to find mitigation measures for?***

E-mail exchange available here. Why isn't this part of the RDEIR?  
[https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223\\_40%20Responsive%20Documents.pdf](https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/767/2223_40%20Responsive%20Documents.pdf)

**From:** Wendy Bates <[wbates@mpc.edu](mailto:wbates@mpc.edu)>  
**Date:** November 11, 2021 at 1:46:04 PM PST  
**To:** Golden Anderson <[ganderson@carmelunified.org](mailto:ganderson@carmelunified.org)>  
**Subject: Re: facility use at MPC**

Hi Golden,

Renting the MPC facility is certainly something we can attempt to work out with you. Typically our facility isn't available until 8:00pm on T-W-TH and 6:00 or 6:30 Monday & Friday if it's not being rented for a high school game. We have some flexibility in this but not a lot.

I will look into a couple of other things and see where we could work it out to be a little more available.

I hope that helps with a little perspective.

Take care,  
Wendy

On Wed, Nov 10, 2021 at 2:08 PM Golden Anderson <[ganderson@carmelunified.org](mailto:ganderson@carmelunified.org)> wrote:  
Hi Wendy

I have been doing some research on some alternative facilities to rent for our athletic teams once California goes to the late start next school year. As you know, we do not have lights in our facility. I had a few questions that I hope you could help me with.

1. Would MPC be willing to rent out the stadium in the evenings once your teams finish in the Winter Season (Nov - Feb).
2. What times would you anticipate MPC being done with use each evening and when do you think it could be available to rent?

Please let me know when you get a chance.

ps://mail.google.com/mail/u/0/?ik=2d728790ff&view=pt&search=all&permthid=thread-f%3A1716170999777484630%7Cmsg-f%3A17161709997774... 1/2

/12/21, 7:40 AM

Carmel Unified School District Mail - Fwd: facility use at MPC

Thank you.

--

**Golden Anderson**  
**Athletic Director**  
**Carmel High School**  
[www.carmelunified.org](http://www.carmelunified.org)  
**831-621-1821 x2796**

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3  
con't.

## Response to Letter 159b, Concerned Carmel Residents

1. This comment is about the alternative to have practices and games at Monterey Peninsula College. See Section 18.0, Alternatives for a discussion of the alternative to have practices and games at Monterey Peninsula College. The comment does not raise an environmental issue and therefore, no response is necessary.
2. Table 4-2 presents all of the practices and games post project; however, not all of them would require lights. See also response to Letter 2b, comment 2.
3. This comment does not raise an environmental issue and therefore, no response is necessary.

From: **Robert Hoag** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sat, Oct 8, 2022 at 8:09 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

1

I am against the addition of field lights at the Carmel high school with out more information on the actual number of planned uses along with the times. These need to be restricted to once a week for any games with lights off by 9pm and any other events should be prohibited with strict fines if violated. Practices during the week should have a cut off time of 7pm These are arbitrary figures as an example, the point being that the hours and number of night used needs to be more clearly defined and amplified sound systems should also be restricted to the major games only.

The use of the new focus lenses for the stadium lights, that direct the lights onto the field only, should be a requirement as well as better studies for their placement so as to cut down on neighborhood interference.

In general, as pointed out by the group opposing the lights there needs to be much better transparency and agreement about all aspects of the planned installation and how it will be controlled.

We don't want this to happen, which will undoubtedly result in lawsuits:

<https://youtu.be/tVutvv5VKas>

Thank you

Robert Hoag

[doane@doanehoag.com](mailto:doane@doanehoag.com)

3268 Camino del Monte

Carmel, California 93923



## Response to Letter 160, Robert Hoag

1. This comment is regarding the number of days and hours the lights would be on. This information is provided in Section 4.0, Project Description, specifically in Tables 4-2 and 4-3. See also response to Letter 2b, comment 2.

From: <[angelaweigel@aol.com](mailto:angelaweigel@aol.com)>  
Date: Sat, Oct 8, 2022 at 12:02 PM  
Subject: Stadium Lights Support  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Dear CUSD,  
dear Dan Paul,

1

I am writing this email to voice my strong support for the Stadium Light and all the additional improvements.

As a mother of 3, I want to encourage you to move forward with the planned improvements as soon as possible. Our children attending the CUSD deserve to play Friday night games under the lights. They deserve fall/winter practices under the lights. They deserve to play as much sports as possible to stay healthy and mentally strong.

Please don't listen to a small group of activists with their fear based comparisons that have no connection to our amazing school district. This group is not interested in solutions. Their motives are selfish and serve exclusively to shut down any kind of improvements entirely!!

Make our amazing Carmel School district the best it can be!! LET THERE BE LIGHTS!!

Respectfully,

Angela Weigel

*Angela Weigel*  
*mobile: 831-707-4255*

## Response to Letter 161, Angela Weigel

1. The commenter expresses their support for the proposed project, but does not comment on the RDEIR. Therefore, no response is necessary.

On Oct 8, 2022, at 12:56 PM, Jim Suchan <[jim.suchan@gmail.com](mailto:jim.suchan@gmail.com)> wrote:

Board Members and Superintendent

1 | The attachment contains my feedback on the RDEIR.

I propose an alternative, not addressed in the RDEIR, that provides a compromise solution that many people may be able to live with. This solution can provide adequate illumination for all practices and "close-to-the ground" sport's games.

Also, a comprehensive, systems focused car access and circulation study is needed regardless of the stadium lights issues. The parking and traffic backup on Carmel Hills Drive 15-20 minutes before and after classes creates a potentially disastrous situation.

You can contact me at [jim.suchan@gmail.com](mailto:jim.suchan@gmail.com) or at 831-915-7040 (phone or text) if you have questions, comments, or require additional information.

Jim Suchan

## Comments on RDEIR

1  
con't. Described below are my comments on the RDEIR. My focus is on the RDEIR Alternatives, Project Objectives, the inaccurate causal relationship between Late Start and 70 and 80 foot lights, and the Traffic Management Plan (TMP) that attempts to treat car access and circulation to improve student and neighborhood safety.

My comments are significantly influenced by my living on Carmel Hills Drive for over 35 years. That experience has provided me with data and insight into parking and traffic/circulation problems and the past interactions between CHS administrators and the neighborhood.

### 2 **Incomplete List of Alternatives (2.4; pgs. 30-35)**

Like the previous EIR, this RDEIR fails to examine additional alternatives. In fact, the RDEIR is guilty of either/or thinking that significantly narrows the possible solution set to providing adequate lighting for sports' games and practices. This incomplete list of alternatives is a fundamental flaw in the RDEIR that impacts discussion and analysis throughout the report.

Here's a specific example.

The RDEIR does not assess the feasibility of portable lights and or lights no higher than 30-40 feet to light the stadium for practices and games. Except for football, other sports that use the stadium—field hockey, lacrosse, soccer, and track and field—are “close-to-the ground” sports. That means almost all of the playing action occurs at a height no higher than 6 feet from the ground. Requirements for lighting are less demanding for these sports. According to soccer referees I have spoken to, both high school and even some junior college evening soccer games are played on fields using portable lights that provide adequate illumination.

Football is the only CHS sport requiring high-level illumination. The reason is fairly obvious: the ball flight from punts, kickoffs, and some long passes requires increased lighting created by 70-80 foot poles. But that level of illumination is only needed during actual games. Portable or lower level lights are adequate for practice. Furthermore, the practice time requiring lights lasts approximately from mid or late October through mid November.

**There is no reason why football games can not be held on Saturday afternoons, thus obviating the need for 70-80 foot lights. That has been the case since Carmel High fielded a football team.**

3

### **False Causal Relationship between Late Start and 70-80 Foot Lights**

The RDEIR (2.4, pgs 30-31; 18.0, pgs 341-347) indicates a causal relationship between Late Start and the construction of 70-80 foot lights. That causal relationship is false and undermines RDEIR credibility.

The cause of that false causality is the limited set of alternatives the RDEIR considers. In the previous section I described an alternative (there may be others) where adequate lighting can be provided to provide illumination for practices and close-to-the ground games due to decreased daylight availability created by Late Start. **That alternative precludes the need for 70-80 foot light poles.**

In addition, Carmel High in conjunction with the RDEIR fails to describe other actions that the school could take to free-up time for after school activities including sports. For example, could study halls be eliminated, could lunch or breaks be shortened, could most before class announcements be placed on the website, could the bell schedule be reconfigured?

In short, Late Start **may** require illumination of the stadium for practices and close-to-the ground games. However, it does not require the construction of 70-80 foot light poles.

4

### **Fuzzy Project Objectives (4.1)**

The CEQA states that a **clearly** written statement of objectives is needed to help the lead agency develop alternatives (18.0, 18.1; pg. 341). Similar to the previous DEIR, this RDEIR contains abstract, virtually impossible to measure if met, project objectives. Furthermore, those objectives fail to account for the fact that CHS is embedded in a dense residential neighborhood. Here are some examples

Objective 1 discusses “enhanced learning environment” and “contemporary standards of education,” and improves the District’s athletic programs.” What exactly do these phrases mean?

Objective 2 reasserts the false dichotomy between Late Start and 70-80 foot lights.

Objective 4 : Improve athlete and spectator safety: The RDEIR neither defines nor provides criteria for safety and provides no evidence to support the objective. In fact, one could argue that night activities could create a less than safe environment.



4  
con't. Objective 5 states that Carmel High needs to have a “stadium facility equal to that of other schools.” However Carmel High is not like other schools because it is embedded in a dense residential neighborhood.

5 **Need for a Systems Oriented Traffic Management Plan (11.1)**

I applaud the plans to increase parking and the construction of a 18 foot access road to reach the new parking created by the destruction of the tennis courts. Furthermore, the TMC is a step in the right direction.

That said, the RDEIR and CUSD do not go far enough to improve on-campus circulation and fire and emergency vehicle access. What is needed is a comprehensive study that analyzes car access and circulation to gauge the ability of ambulances, fire trucks, and other emergency vehicles to reach homes in the immediate neighborhood. That study should be conducted in the 15-20 minutes before and after school starts, during typical football games, during Homecoming, the Shoe, and other rivalry opponents games (Monterey High), and during Back-to-School and College nights.

**That study should be conducted and its results communicated to all stakeholders before any decision is made on stadium lights.**

The RDEIR bases its assessment on Highway 1 traffic conditions—that is lack of significant traffic backup--on **only one data point (11.1, pg. 279, June 11, 2021 between 5:00-5:30)**. The report fails to acknowledge that this date is at the height of the COVID pandemic that caused significant decrease to businesses and tourism throughout the Monterey Peninsula. Furthermore, I have lived along Highway 1 for 36 years. Over the years traffic backups occur regularly between 4:00 and 6:00PM both northward between Carmel Valley Road and Carpenter as well as southward. In addition, Appendix K, pg 8 supports my assertions. The TKJM study notes that significant issues were observed along Highway 1 in the vicinity of the project during the AM and PM peak hours.

The RDEIR’s claim that Highway 1 backup is not a significant issue based one data point once again undermines the RDEIR’s credibility. Furthermore, vehicle access and circulation is a significant issue that impacts safety.

In addition, the RDEIR drafters have made no attempt to speak with neighbors who have first-hand experience with the numerous traffic challenges that currently exist at Carmel High let alone additional challenges that would be created by evening football games.

Here is additional information that supports the need for a comprehensive car access and circulation study.

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Currently, the 15-20 minutes before and after school starts is a traffic and safety nightmare. Despite no parking and no standing signs, cars are lined up on both sides of Carmel Hills Dr, narrowing the street to one lane. Furthermore, because of CHS parking lot access problems and parent drop offs, cars are at times backed up on Carmel Hills Dr for about 150 yards making it difficult for people to leave their driveways.

Asking the State High Patrol to write tickets has been unsuccessful. The Highway Patrol Officers I spoke with indicated writing parking tickets is a very low priority, they have a large area to patrol, and they are short-staffed.

**This current situation compromises neighborhood safety due to the difficulty of emergency vehicles having access to homes on Carmel Hills Drive near CHS.**

Neighbors near CHS have detailed information about vehicle challenges. However, they have no voice on the TMP and were not contacted by the RDEIR writers. That's ignoring important stakeholders. They should have representation on the TMP committee.

Busing sports fans from the Middle School to CHS is a very good idea. However, there's no enforcement mechanism to prevent people from parking in the neighborhood. The posting of game day no parking signs has worked, but how long will that continue? Furthermore, the TMP, though well intentioned and containing a number of good ideas, admits it can only encourage parents and students to park at CMS and use shuttle buses.

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**Summary**

Despite its lengths, the RDEIR is in a number of crucial areas incomplete:

- The very important alternatives section is limited, failing to consider other possibilities that could enlarge the possible solutions to meet Late Start impact on athletic teams practices and games
- The RDEIR fails to analyze and explain the causal linkage between Late Start and 70-80 foot Stadium Lights. That linkage is a result of the limited alternatives examined
- The Project Objectives section is in some places abstract, requiring either additional details or further explanation
- The TMP needs to be expanded to include a car access and circulation analysis. To put it another way, this issue of access and circulation is a complex transportation systems problem that increased parking alone will not solve.

These issues and undoubtedly others need to be addressed before an informed decision can be made about the Stadium Lights project.

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con't. | This long, costly process raises a fundamental question: Is Friday night football worth the cost, time, energy, and damaged community relations when there is an easily available alternative: temporary or 20-30 foot lights that provide adequate illumination for all sport practices and close-to-the ground sports' games?

Jim & Louise Suchan  
25225 Carmel Hills Drive  
[jim.suchan@gmail.com](mailto:jim.suchan@gmail.com)

Bob & Sue Martin  
25215 Carmel Hills Drive

## Response to Letter 162, Jim Suchan

1. The commenter first provides a cover e-mail which introduces his feedback on the RDEIR (included as an attachment) including a brief overview of his proposed alternative and his request for a comprehensive, systems focused car access and circulation study. These issues are addressed below.

As an introduction to the attached letter, the commenter provides an introduction to the commenter concerns, which are addressed in the following responses.

2. Regarding portable lights, see response to Letter 14-1-t and 14-6-u. Regarding shorter lights for practices and games, see response to Letter 14-1-r, comment 7. Regarding track and field, see response to Letter 2b, comment 2, as the school has determined that track and field practices and events would not be held in the evening under the lights. Regarding soccer, lacrosse, and field hockey, it is not likely that the field of play would be under six feet.
3. The purpose of an EIR is to objectively evaluate the environmental effects of a proposed project, regardless of the merits of a proposed project. A decision on the project's merits will be made by the Board, who will consider all comments. Regarding shorter light poles, see response to 2 above. Regarding the bell schedule, see response to Letter 114c, comment 2.
4. Regarding the objectives, see response to Letter 2b, comment 1 and 14-2-g, comment 2.
5. The commenter agrees with the new parking plans, but indicates that the improvements to on-campus circulation and fire and emergency vehicle access needs to be expanded by first conducting a comprehensive study. Comment notes, however, it does not raise an environmental issue and therefore, no response is necessary.

Regarding access, circulation, and safety, see response to Letter 14-2-f, and 14-4-k. Regarding circulation and safety in the neighborhoods, see response to Letter 2b, comment 3.

Regarding parking at the middle school associated with the Traffic Management Plan, no environmental issue is raised and therefore, no response is necessary.

6. Regarding alternatives, see response to Letter 2c, comment 22.

Regarding late start and the stadium lights, see response to comment 3 above.

Regarding project objectives, see 4 above.

Regarding the Traffic Management Plan, mitigation measure 11-4 requires preparation and implementation of a Traffic Management Plan during the highly attended events, to ensure smooth traffic circulation, parking, and safety.

No changes to the RDEIR are required.

From: **JUDI LEAVELLE** <[animalfarmequine@aol.com](mailto:animalfarmequine@aol.com)>  
Date: Sat, Oct 8, 2022 at 12:48 PM  
Subject: RE: The Lights Controversy  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Dear CUSD decision makers,

1 I am a retired CUSD Tularcitos kindergarten teacher and drive past Carmel Middle School at least once a week.

My suggestion for the problem of the lights for the field could be easily solved if you were to change the location of the field to the huge parcel you own right next door to CMS.

Three sides of this property has no neighbors and the field could be set back from CV Road and the Cottages of Carmel with the front of the property being used for parking.

There would be plenty of space for parking @ CMS and on the CV RD side of the field and the entrance to the new field could be through CMS.

There is already a traffic light there to control the flow of traffic.

Students could be bused there for after school practice sessions or drive their own cars to practice.

It would be much easier to build a new field next to CMS than to switch the CMS campus with the CHS campus.

It would be a huge shame to give up the CHS tennis courts that have been there forever for a place to park cars.

Please consider this idea.

Sincerely,

Judith Leavelle-King

## Response to Letter 163, Judi Leavelle-King

1. The commenter endorses the project alternative to build a light stadium at the Carmel Middle School. This alternative was studied in the RDEIR, Section 18.0, Alternatives. No environmental issues are raised and therefore, no response is necessary.



From: **Trischa Tuesta** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sat, Oct 8, 2022 at 12:55 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from from the Carmel Views neighborhood.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr on 12/7/2021 at 5:48pm:

[https://drive.google.com/file/d/1mOqyqOWRp60fDM\\_IrzgQMFtarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyqOWRp60fDM_IrzgQMFtarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr on 12/7/2021 at 6:21pm:

<https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County’s noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

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C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

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B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHwtAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments

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(Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light poles will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Trischa Tuesta

[trischatuesta@gmail.com](mailto:trischatuesta@gmail.com)

26090 Dougherty Pl

Carmel, California 93923



## Response to Letter 164, Trischa Tuesta

1. See response to Letter 2b.

From: **Michael Heymann**, <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sat, Oct 8, 2022 at 2:00 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

The letter drafted by Carmel Friends and Residents Against CHS Stadium Lights, is self explanatory and covers many of the issues raised. I therefore will not include it here but will confirm my support for their conclusions. I will add that the noise and light concerns are perhaps even worse than you might expect. In the Carmel Highlands noise carries to us from events at Pebble Beach and the additional light provided for such events is strong enough for us to read by. Further Laguna Seca activity is quite readily heard. Noise travels amazingly, particularly when stemming from PA announcements. Music, cheering and announcements at the high school will be readily heard in the Highlands and I assure you will be an unpleasant contribution to our quiet lives. I strongly oppose the planned night-time activities; Very STRICTLY controlling these relative to start and finish times as well as noise level likely will not work given the nature of high school activities and attendees.  
Michael Heymann, M.D.

Michael Heymann,  
[heyport@prodigy.net](mailto:heyport@prodigy.net)  
175 Corona Rd  
Carmel, California 93923

## Response to Letter 165, Michael Heymann

1. The commenter indicates their support for the letter drafted by the Carmel Friends and Residents Against CHS Stadium Lights and their general concerns regarding noise and lighting as a result of the proposed project. Noise is addressed in Section 10.0, Noise of the RDEIR and lighting impacts are addressed in Section 5.0, Aesthetics of the RDEIR.

From: **Peggy Licari** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sat, Oct 8, 2022 at 2:47 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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Each of the numbered sections below correspond to the numbered items above.

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C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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- i. Disallow lights usage on weekends for any use, period.
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C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

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<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

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C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

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B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments

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(Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

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iii. CHS stadium is at 335-ft above sea level, so 80-ft light poles will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Peggy Licari

[peggylicari91@gmail.com](mailto:peggylicari91@gmail.com)

8790 Carmel Valley Rd

Carmel, California 93923

## Response to Letter 166, Peggy Licari

1. See response to Letter 2b.

From: **William Gablin** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sat, Oct 8, 2022 at 3:46 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact



on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from from the Carmel Views neighborhood.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

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The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

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[williamgablin@comcast.net](mailto:williamgablin@comcast.net)

521 Loma Alta Road

Carmel-by-the-Sea, California 93923

## Response to Letter 167, William Gablin

1. See response to Letter 2b.



From: **Vicki Sinnhuber N.P.** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sat, Oct 8, 2022 at 4:03 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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i. Map image of setback for stadium:

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

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a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Vicki Sinnhuber N.P.

[vsinnhuber@csvs.org](mailto:vsinnhuber@csvs.org)

25383 Flanders Dr

Carmel, California 93923



## Response to Letter 168, Vicki Sinnhuber

1. See response to Letter 2b.

From: **David Allan** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sat, Oct 8, 2022 at 4:25 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

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B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from from the Carmel Views neighborhood.

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C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

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B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County’s noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

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The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

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NOTE: In the past, I lived for many decades in Carmel before retiring and moving away to Idaho. I remember Carmel as a peaceful place (with its touristy problems like Highway 1, between Carmel Valley Road and Ocean Ave). Now, with the changes to radically increase the noise, lighting, and traffic problems, I can see the attitude that puts money and publicity over the serenity and quiet that has made Carmel a refuge. Stop and TJHINK!

David Allan

[captainlingcod777@gmail.com](mailto:captainlingcod777@gmail.com)

7535 West Prince Street

Boise, Idaho 83714

## Response to Letter 169, David Allan

1. See response to Letter 2b.

From: **Susan Wytshyn** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sat, Oct 8, 2022 at 5:28 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments

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con't.

(Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light poles will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Susan Wytshyn

[swytshyn@yahoo.com](mailto:swytshyn@yahoo.com)

25315 Flanders

Carmel , California 93923

## Response to Letter 170, Susan Wytshyn

1. See response to Letter 2b.

From: **Carol Pendergast** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sun, Oct 9, 2022 at 8:47 AM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements". These comments sum up my opposition to the stadium lights since I live in a neighborhood directly affected by the lights, noise and traffic that would ensue.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from from the Carmel Views neighborhood.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr on 12/7/2021 at 5:48pm:

[https://drive.google.com/file/d/1mOqqyKOWRp60fDM\\_IrZgQMFarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqyKOWRp60fDM_IrZgQMFarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr on 12/7/2021 at 6:21pm:

<https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pIL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school

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year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that “existing traffic noise levels already exceed the County’s noise exposure standards for single family residential (70 Ldn or dB)”. However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and



55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which

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requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees ("special status plant species") would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGastHtwltAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at

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CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

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a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Carol Pendergast

[cspendergast@gmail.com](mailto:cspendergast@gmail.com)

25765 Carmel Knolls Dr.

Carmel, California 93923

## Response to Letter 171, Carol Pendergast

1. See response to Letter 2b.

**LIGHT TO PROTECT THE NIGHT**  
 Five Principles for Responsible Outdoor Lighting





**USEFUL**



**ALL LIGHT SHOULD HAVE A CLEAR PURPOSE**

Before installing or replacing a light, determine if light is needed. Consider how the use of light will impact the area, including wildlife and the environment. Consider using reflective paints or self-luminous markers for signs, curbs, and steps to reduce the need for permanently installed outdoor lighting.

**TARGETED**



**LIGHT SHOULD BE DIRECTED ONLY TO WHERE NEEDED**

Use shielding and careful aiming to target the direction of the light beam so that it points downward and does not spill beyond where it is needed.

**LOW LIGHT LEVELS**



**LIGHT SHOULD BE NO BRIGHTER THAN NECESSARY**

Use the lowest light level required. Be mindful of surface conditions as some surfaces may reflect more light into the night sky than intended.

**CONTROLLED**



**LIGHT SHOULD BE USED ONLY WHEN IT IS USEFUL**

Use controls such as timers or motion detectors to ensure that light is available when it is needed, dimmed when possible, and turned off when not needed.

**COLOR**



**USE WARMER COLOR LIGHTS WHERE POSSIBLE**

Limit the amount of shorter wavelength (blue-violet) light to the least amount needed.

Carmel Unified School District Board of Education,

1

I have been evaluating the Revised Draft EIR from two perspectives. The first is from the viewpoint of the five outdoor lighting principles of the Illuminating Engineering Society and the International Dark Sky Association. The second is from the viewpoint of a resident of Carmel, CA, "the greatest meeting of land and water in the world," and as a neighbor of Carmel High School, "the greatest institution of learning in that land."

# FIVE OUTDOOR LIGHTING PRINCIPLES

## PURPOSE

- 2 **Use light only when it is needed. All light should have a clear purpose. Consider how the light will impact the area, including wildlife and their habitats.**

The first board meeting on the CHS lights was held in May 2021, and it was clear that members felt that the purpose of the lights was to get better utilization of the athletic facility. The second purpose mentioned was to accommodate late-start for the benefit of athletic practices. The third purpose discussed was to give students a Friday Night Lights social experience. In the conversation among the board members, the major concern was that the community may be negative on another major lighting project based on the uproar after the surprise installation of the pool lights in 2007 - 8. Angst about the lighting coming from the community would be the roadblock they must overcome, and the most important factor in the original Draft EIR.

In reality, lighting the football stadium is a much larger and more complex problem than the pool lighting. The football stadium requires substantially more illumination, creates significant noise pollution, causes parking and traffic issues, requires protection of a scenic corridor and the consideration of alternative locations.

*\*Sixteen months later, it seems likely that some modification of schedules might work and save people's time and \$4M. Why try the most expensive and disruptive option first? The lights, parking lots, and other changes are out of character with the ethos of Carmel, bringing an urban appearance and most likely urban problems.*

## TARGETED

- 3 **Direct light so it falls only where it is needed. Use shielding and careful aiming to target the direction of the light beam so that it points down and does not spill beyond where it is needed.**

At great expense the Musco system design achieves some of these objectives. However the nature of aerial sports means that it is not possible to be completely



3  
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successful, and most of the sports that will be played here are of that nature. Musco uses a total of eight uplights to illuminate the bottom of the ball so that players will be able to see a high flying football clearly against the background. The EIR never mentions their existence, but they are present; see Figures 4-3 and 4-4. These uplights will bathe the volume of space above the field with 416,000 lumens of a blue-white light, cause skyglow above the stadium and intrude on the neighboring properties located at higher elevations.

*\*The EIR should show a before and after simulation of the skyglow.*

Another portion of this light will exit at an angle which may well reach surrounding neighborhoods located at higher elevations, as can be observed at the Seaside High School field, also a Musco lighting installation. Carmel Views is particularly susceptible to this effect because of its location.

*\*The EIR should address the amount of uplight which will impact the neighboring community because this is not included in IDA's calculation.*

Note: The Musco luminaires emit 40% of their light as blue light which is easily scattered by fog and small particles in the air. This is the cause of skyglow. The amount of blue light from uplights could be reduced if the LEDs were a warm white color, e.g. a Correlated Color Temperature (CCT) of 3000K.

## LOW LEVEL

4

**Light should be no brighter than necessary. Use the lowest light level required. Be mindful of surface conditions as some surfaces may reflect more light into the night sky than intended.**

The proposed CHS lights will illuminate the field at an average level of 53 foot-candles.

The Illuminating Engineering Society recommends 30 foot-candles for stadiums that seat less than 2000 spectators in their report, IES RP-6-15. According to the Revised Draft EIR, page 57, the current capacity of the stadium is 1081 spectators. Capacity for an additional 278 spectators will be constructed, page 76. That will bring the new total capacity up to 1359 spectators, far below 2000. By comparison, Monterey High School proposes an average of 42 footcandles of illumination for a stadium that will seat 1700 people.

4  
con't.

*\* Why does CHS need more illumination than that recommended by the IES?*

Does your plan include lighted pathways to safely handle large crowds? Have you considered the use of reflective paint and self-luminous markers? Will the parking lot lights use luminaires with a CCT of 3000K or less?

*\*Please address this topic.*

Mitigation of surface effects is not mentioned in the EIR. An analysis might show that some modifications could reduce reflections off of objects near the field. For example, you might be able to use a flatter or darker paint color on vertical surfaces of buildings on the east side of CHS reducing light trespassing into the community.

*\* Please address this opportunity to reduce reflections.*

## **CONTROLLED**

5

**Use light only when needed. Use controls such as timers or motion detectors to ensure that light is available when it is needed, dimmed when possible, and turned off when not needed.**

The EIR takes the opposite approach. There will be no flexibility or adaptation to the interests of the community. See page 5-62 in the Revised Draft EIR. All the lights will be on all the time at full power for all sports whether a practice or game, an insult to the environment and community. This is contrary to one of IDA's requirements for outdoor sports lighting certification. Also one of the features of LEDs is dimmability, a feature not considered by CUSD.

*\* Please address this.*

Do you really need the uplights for a track meet or band practice? No, you do not. For field hockey? For soccer with its large white ball? For all practices?

*\* Please address this.*

The Show-Light Package listed on the control summary page in Appendix C, page 13, indicates a disregard for your neighbors. Monterey High School is not going to operate such a system, see page 2-679 in their Final EIR.

The need for this add-on was never discussed. More light, more sound. When do you plan to use it? Page 33 in Appendix C lists seven Show-Light luminaires installed on the four pool towers, consuming 1600 watts of energy, and adding

5  
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another 155,000 lumens of light. I assume these will project a video image onto the football field.

*\*Is this correct? Have you included information on the sound system? Why was this disruptive capability buried in an Appendix in the RDEIR?*

*\*Do you plan to install any other equipment on the towers?*

*\*Please address this.*

## MINIMIZE BLUE LIGHT

6

**Use warmer color lights where possible. Limit the amount of shorter wavelength blue-violet light to the least amount needed.**

The light from the luminaires comes from large blue LEDs. They are coated with a phosphor that "downshifts" 60% of the blue light to the other colors of the visible spectrum and gives the LEDs a cold white appearance. About 40% of the emission is blue according to industry sources, much higher than other outdoor bulbs. Forty percent of 5.4 million multiplies to more than 2 million lumens of blue light. The pool lighting is about 1.0 million lumens. Take 40% of that, and you have another .4 million lumens of blue light.

We don't know much about the long term health effects of blue light at night, especially at such high levels of illumination for periods of two hours or more. That is not surprising. The blue LED was just invented in the 1990s as a result of a scientific breakthrough (the discoverers received the Nobel Prize in 2014.) It served such an important energy conservation need that it was put into full scale production in the last decade and has been a great commercial success. It has reduced energy use when deployed responsibly using warm white color LEDs with a CCT of 2700 – 3000K. Outdoor sports lighting is a new application that increases energy consumption. It uses cold blue-white LEDs with a CCT of 5700K.

In studies of the human circadian system, blue light has been found to be very effective in suppressing melatonin and can cause sleep deprivation. The effect depends on the intensity and duration of the blue light at nighttime. The emission spectrum of a 5700K LED shows a peak around 460 nanometers, matching the peak of the human circadian sensitivity. There is now worldwide concern as blue-white LEDs continue to replace warmer lighting choices. An internet search of "blue light" and "human circadian system" will demonstrate this concern. A good recent summary is "Artificial Light at Night: State of the Science 2022" published by IDA.

6  
con't. | *Will the Final EIR address this and other potential health issues of blue light at night? The loss of natural darkness due to LEDs should be a human health concern for everyone, especially institutions of learning like Carmel High School.*

## OTHER COMMENTS

### ***SIMULATION***

7 | Living in Carmel Views for 24 years, I have seen the east side of Carmel High School after dusk hundreds of times and know that the existing nighttime photo in the Revised EIR, Figure 5-1b or Fig 5-15a, is misleading. The principal nighttime illumination today comes from several parking lot security lights, not lighting throughout the campus. It looks like the EIR photo was taken when there was a major nighttime event on the campus and/or nighttime construction on Highway One.

Comparing an accurate typical nighttime photo today with the simulation in the Revised EIR, Fig. 5-15b, will show a dramatic increase in brightness from what we normally see, and it will occur on 147 nights of the year. It will be a shock to the community of Carmel. With an output of about 5 million lumens, the field lights will have a significant negative impact on the aesthetics of Carmel without even counting the pool lights which will be on for 84 nights per year at about one million lumens.

*\* What was the date and time of the photos, Figures 5-1b or Fig 5-15a?*

### **Project Impact 5-2**

8 | Under the heading of Aesthetics on page 320, the RDEIR states that

Impact 5-2. 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 (Significant and Unavoidable).

*\*We disagree strongly with the word slightly and recommend deleting it. During the most scenic time of the evening, between sunset and dusk, many residents of Carmel will be looking at Point Lobos through a cold white artificial fog.*

9

## **68 Game Nights?**

*\* There may be an error on page 174 based on the way the text reads.*

- ♣ 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.
- ♣ Boys and girls track and field. Four meets (combined).

*I count  $6 + 10 + (12 \times 2) + (12 \times 2) + 4 = 68$  night games.*

10

## **Class III, not Class IV?**

*\* In Appendix D, IDA lists the CHS Stadium as Class IV; based on IES document RP-6-15, it should be Class III*

11

## **Visual Impact During the Day**

*Planting trees that grew to a medium height just outside the eastern fence line would block a substantial amount of the light scattered off of parked cars, and be welcomed by many residents.*

Sincerely,

*Joe Longo*

## Response to Letter 172, Joe Longo

1. This is an introductory paragraph about the issues to be addressed in the letter. No response is necessary.
2. This comment is about the proposed stadium lights. See Section 5.0, Aesthetics of the RDEIR for an analysis of the lighting impacts.
3. This comment is about where the lights are projected and the skyglow impact. See Section 5.0, Aesthetics, of the RDEIR starting on page 5-40 regarding sky glow and light and glare, as well as responses to Letter 2b, comment 2, and Letter 96, comment 1.
4. This comment is regarding the Illuminating Engineering Society's recommendations for foot-candles for various stadium sizes. The proposed stadium lights have been designed based upon the specifications for Carmel High School. The IDA has released guidelines for community friendly sports lighting. These guidelines allow light levels of any IES RP-6 or CIE-150 recommended light level, not to exceed 10 percent of the average light level. This guideline puts limits on uplight, backlight, and glare. This standard also allows for any CCT desired as long as it meets all other requirements. This standard can be found at the link below.

<https://www.darksky.org/wp-content/uploads/bsk-pdf-manager/2021/07/Final-OSL-v1.1.pdf>

According to Musco staff, per the IES-RP6-20, High School facilities can fall under either Class II or Class III play. The package selected for Carmel High School would fall under either 50FC 2:1 Max:Min (Class II) or 30FC 2.5:1 Max:Min (Class III). The difference between these two is that Class III is recommended for facilities with up to 2000 spectators and Class II is recommended for facilities up to 5000 spectators. When discussing light levels for a competition field it is also important to consider the speed of play. When playing football not only is the ball moving, but so are 22 athletes at the same time. Athletes are trying to do many things like catch a ball while running, or throw a ball to a moving target. With all these moving pieces more light is generally more beneficial.

Regarding mitigation of surface effects, the lights would be focused on the playing field only, with minor lighting for the stands, and the illumination would not go beyond the edge of campus. See response to Letter 2c, comment 19, and the addition of [Figure 4-2d in Section 3.0 of this Final EIR](#). Therefore, there would be no surface glare/reflection effects to mitigated. No other changes to the RDEIR are required.

5. The school lights (pool and stadium) are being certified by the IDA and the school district will comply with IDAs requirements. Regarding the up lighting, lights will not be used for band practice or track and field. Please refer to Section 4.0, Project Description, of the



RDEIR. The proposed light poles would include “Total Light Control for LED with BallTracker” technology, to track the football, lacrosse or soccer ball. See response to Letter 2b, comment 2.

Regarding the Show-Light package, the school district does not intend to use that option and it would not be part of the project. The show light package mentioned simply creates different scenes (light shows) to enhance the gameday experience. This package would not include light shows synced to music and uses only the lights provided for the field meaning there will be no extra light or sound generated by this controls package. This controls configuration along with Musco’s standard LED Control and Monitoring package meet all of the criteria for controls as listed in the IDA-Criteria for Community-Friendly Outdoor Sports Lighting v1.1

6. Regarding blue lights and the human circadian rhythm, see response to Letter 5, comment 3.
7. The pictures were taken when the pool lights were on and are not misleading. It is acknowledged that taking a picture when no school lights were on would present a much darker existing picture. No changes to the RDEIR are necessary.
8. The term “slightly” refers to the modification of the project site, not the impact of the lighting when viewed from publicly-accessible places outside of the campus. No changes to the RDEIR are required.
9. Regarding the number of games, there was an error on page 174. See response to Letter 2b, comment 2 and changes to the RDEIR in Section 3.0, Changes to the Revised Draft EIR, of this final EIR. The school has determined that track and field would not be played under the lights and therefore, the new total is 64.
10. The class of the facility does not affect the International Dark Sky Association certification. According to Pete Strasser with the association (email to Dan Paul, November 9, 2022), the class was thought to be important early on, but the criteria were modified last year to omit the class declaration. There are no levels of accepted trespass or altered criteria based upon the class of play. If the project passes, it passes regardless of class. Per the response to comment 4 above, the size of the venue is not the only factor that determines Class of Play. Class IV is for facilities with limited to no spectator capacity which does not seem appropriate for a high school football field. High School fields fall under either Class II or Class III, and as mentioned above since football had a high speed of play with lots of activity, generally more light is beneficial.
11. Regarding planting trees, see response to Letter 2b, comment 2 regarding a landscape plan.

From: **Canyon Haverfield** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sun, Oct 9, 2022 at 3:11 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from from the Carmel Views neighborhood.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr on 12/7/2021 at 5:48pm:

[https://drive.google.com/file/d/1mOqyqkOWRp60fDM\\_IrzgQMFtarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyqkOWRp60fDM_IrzgQMFtarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr on 12/7/2021 at 6:21pm:

<https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

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- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County’s noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

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C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

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B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments



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(Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Canyon Haverfield

[canyon73@gmail.com](mailto:canyon73@gmail.com)

Box 989

Carmel By The Sea, California 93921

## Response to Letter 173, Canyon Haverfield

1. See response to Letter 2b.

From: [dillardjohnt@yahoo.com](mailto:dillardjohnt@yahoo.com) <[dillardjohnt@yahoo.com](mailto:dillardjohnt@yahoo.com)>  
Date: Sun, Oct 9, 2022 at 2:13 PM  
Subject: Public Comment Submission for Carmel High School Stadium Improvements SCH# 2021050293  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: [tarthur@carmelunified.org](mailto:tarthur@carmelunified.org) <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, Karl Pallastrini <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, Sara Hinds <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, Seaberry Nachbar <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, Anne-Marie Rosen <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

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Attached is our feedback on the RDEIR for Carmel High School Stadium Improvements SCH# 2021050293. Please confirm receipt.

Below are the hyperlinks located inside the attachment regarding your objective to “*Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds.*”

- [School Vehicular Access and Circulation Study Conestoga High School](#)
- [PEDESTRIAN AND VEHICULAR CIRCULATION STUDY FOR LA SALLE HIGH SCHOOL](#)
- [Glens Falls School District Traffic Circulation Study](#)

CHS has a chronic traffic circulation problem that we believe endangers students, staff and visitors to the campus on a daily basis. Trying to solve this safety problem through additional parking spaces in an already overbuilt campus neither addresses the root cause or solves the long-term problem. You are not taking the responsible steps to address

- Why are you not considering traffic circulation studies similar to the links above?
- Why are you not doing this step or investment of a Vehicular Circulation Study prior to proposing parking lot solutions? Shouldn't this inform whether your proposed designs will be effective?
- Why not invite the community to be part of the solution process with an on-line survey to diagnose problematic issues that need to be resolved?
- Why not demonstrate community leadership and bring together County Representatives and Residents for working session on acceptable long-term No Parking solutions through signage that is enforceable by law on a daily basis?

We will reply to this e-mail and include a second attachment with further questions and visuals to demonstrate you have missed critical benchmarking in the Environmental Setting regarding emergency access routes, traffic congestion, traffic circulation and fire and emergency vehicle access.

- Why are you not acknowledging or including benchmarking of the existing challenges in traffic circulation?
- Why are you not acknowledging or including benchmarking of the existing parking problems and over-spills the neighboring streets?
- Why aren't you transparent with your Emergency Access Routes and prioritization of safety?

To Superintendent Ted Knight

To School Board Members: Sara Hinds, Tess Arthur, Seaberry Nachbar, Karl Pallastrini, Anne Marie Rosen

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The legal boundary of Carmel-by-the-Sea is less than .2 miles from the entrance of Carmel High School – thus the campus at the top of Ocean Ave is the welcoming symbol to an idyllic charming town with its breathtaking natural beauty and feeling of timelessness. For generations, city founders and community members have come together to take specific measures to protect our environment. From banning streetlights, fast food franchises, and Styrofoam, Carmel has embraced pedal power, clean beaches, quiet evenings for nighttime strolls, and EV charging stations. Our residents and businesses have pride in our beautiful night skies, twinkling lights and the rolling fog that can be enjoyed from Scenic Drive to the top of Carmel Views.

At the heart of our community spirit is our youth – our future of truth, honesty, and civic responsibility. With the gorgeous backdrop of the Santa Lucia mountains, weekend day-time sporting events have been the pride of Carmel High School for 83 years, yielding successful team players and leaders from healthy sports programs with their spirited parental and community involvement.

As a resident of Carmel for more than 25 years, I have witnessed the disappointing and heartbreaking decisions made by CUSD leadership (and School Board Members) chasing short-term fixes with glued together sloppy executions on a small land-locked campus (22 acres) versus a well-planned, meaningful long-term approach that takes care of the next generation of students and community members as a whole.

With a new Superintendent hired in 2021, Ted Knight, who is freshly re-located from Denver, along with a relatively new principal, Jonathan Lyons, who was hired four years ago from the Los Angeles area, the CUSD leadership has boldly embarked upon a “stadium improvement plan” that once again doesn’t take into consideration and responsibility for the future well-being of this community and the students. Our expectation for solutions and alternative start with proper long-term planning. In fact, CUSD acknowledges we are living in a post COVID world with more households migrating to Carmel and contribution to our taxpayer base has significantly increase. Time for re-engaging the community and bring forth long-term thinking and solutions.

***SOLUTION: Time to update the inputs from the 2019 Facilities Master Plan: As projects are developed over time, the Facilities Master Plan (FMP) should be revisited and updated so that it reflects the changing needs of the Carmel Unified School District. This master plan update process is recommended by the California Department of Education every three to five years.***

The CEQA process allows us the community to improve the quality of the project outcome. Please respond to the solutions, comments, questions and insert factual responses and data to each of the detailed request. A reminder, the written responses must describe the handling of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, if CUSD’s position varies from that of our comment, your response must address in detail the reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.

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**PROBLEM: This is an entire new EIR. We request that you re-start the entire project back to the Scoping Session and Notice of Preparation. All the 1) Project Objectives were changed in the RDEIR, 2) RDEIR included entirely new scopes of work that are still in concept stage with little details and 3). CUSD chosen to ignore all the previous comments that were submitted in the DREIR. Why isn’t this an immediate HALT to re-start back to Scoping Session and Notice of Preparation?**

**QUESTIONS and Comments:**

- Why did you change the objectives?
- Why are your new objective direct objectives of your desire? Seems biased?
- Why did you add new scope of work?
- Why shouldn’t this trigger a complete halt and back to Scoping Session and Notice of Preparation?



**1). COMPARISON OF PROJECT OBJECTIVES FROM DEIR TO RDEIR (ALL NEW)**

**WORDING FROM THE ORIGINAL DEIR: ORIGINAL 4.1 PROJECT OBJECTIVES**

The addition of the stadium lights is primarily intended to allow for Friday night football games and other nighttime games and practices at Carmel High School 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 Carmel Unified School District (school district) plans to install the stadium lighting by the start of the 2022-2023 school year. In addition, the new field lighting will:

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

Also in the DEIR: Parking Needs were stated as:

- Existing parking on campus is presented in Section 3.0, Environmental Setting. There is no additional parking proposed as part of the project. Both the Ocean Avenue main campus entrance and the right-turn only access off State Route 1, along with the parking lot adjacent to the baseball field located off Morse Drive, would be made available for nighttime games at the high school stadium.

**RDEIR: 4.1 PROJECT OBJECTIVES**

CEQA Guidelines section, 15124(b) requires an EIR to include a statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding consideration, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits. The objectives set forth below describe the underlying purpose of the proposed project and provide a basis of identification of a reasonable range of alternatives evaluated in this RDEIR. The objectives are numbered for ease of reference only; the numbering does not reflect any priority or weight given to the objectives.

**NEW! 1.** Provide an enhanced learning environment for both physical education and afterschool sports activities that meets contemporary standards of education and improves the District's athletic program for its Carmel High School students and other students in the District;

- What is the specific metric that will measure the success of this objective?
- How will you know you will have achieved this objective?

**NEW! 2.** Provide athletic facilities that facilitate implementation of the State's "late start law" without disruption to the District's existing educational and athletic programs;

- Isn't the largest execution challenge of Late Start Transportation with lack of funding for more buses and the ability to hire more drivers? Can you list out the other challenges of implementing Late Start that aren't related to this RDEIR?
- How do the other Late Start workstreams play a role in this objective? If you can't get more buses and hire more drivers than the outcome of this objective can't be met?

**NEW! 3.** Provide the capability to host sport events and games for Carmel High School students in the evening when students, parents, and community members can more easily attend;

- Do you have athletes in outlying geographies who will be attending late games on Friday and the late evenings might be a challenge? No athletes from Big Sur, etc?
- Why is it easier to attend in the evening? Are you specifically referring to only the six football games? So six football games will require this much of an investment?

**NEW! 4.** Improve athlete and spectator safety during evening sports events and games;

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- Is current athlete and spectator safety at risk?
- What areas are specifically at risk?

**NEW!** 5. Operate an athletic stadium facility that is at least equal with most other local high schools, including the ability to conduct events in the evening; Only PG and Seaside have lights, along with MPC “most” is untrue

- What schools are you referencing?
- You use the word “most” - can you quantify? Can you provide context of the word “most”?

**NEW!** 6. Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds;

- Does CUSD have an ADA transition plan?
- Have you considered a Vehicle Circulation Study?
- What is the current fire and emergency vehicle access plan?
- What do you have in place for security?

**NEW!** 7. Improve and expand on-campus parking facilities to meet need at Carmel High School;

- Improve and expand are two different activities. Can you breakdown what you are trying to achieve?
- Is expand possible? How do you expand beyond 22 acres? Expansion is very much possible at Carmel Middle school? Doesn't CMS expansion make more sense?

**NEW!** 8. Implement “green building” practices that foster energy conservation, and replace out moded athletic lighting fixtures with new fixtures that will obtain dark sky certification.

- Are green building practices only applicable to “athletic areas”?
- Do you have green building practices on the broader campus?

**NEW!** 9. Enhance the spectator experience during sporting events by adding an alternative viewing location different from the existing bleachers;

- How are you defining “spectator experience”? Is that measurable? How do you know you are achieving it?

**NEW!** 10. Augment the secure storage space available to the District’s athletic programs;

- Is this secure storage for athletic needs? Can you provide examples?

**NEW!** 11. Create a new, healthy **weekend** social opportunity for District students while building school spirit;

- We agree with this objective – weekend is an appropriate time. Then you agree, No Friday Night Games?

**NEW!** 12. Reduce operational difficulties and complex coordination issues with respect to the scheduling of practices and games for District athletic programs;

- Can you spell that out? What does “reduce operation difficulties” mean?
- What is complex coordination issues?

**NEW!** 13. Achieve these objectives consistent with the intent of the Facilities Master Plan that was presented to the District’s Board on June 26, 201

- Aren’t Master Plans reviewed and updated every 3 years?
- Aren’t Master Plans just concepts and not fully approved until this phase?

**NEW!** 14. Achieve these objectives within the District’s allocated budget allowances.

- If this is an objective, shouldn't there be transparency and inclusion of budgets?
- How do we know what you are proposing is on budget?
- Can we have a cost breakdown of each of the Project Characteristics?

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## 2). COMPARISON OF SCOPES Of Work FROM DEIR TO RDEIR (ALL NEW)

DEIR (Page 39) 4.2 PROJECT CHARACTERISTICS



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- Proposed Improvements (Field Lights)
- The school district is proposing to install field lighting at the existing stadium at Carmel High School. No additional improvements are proposed

**RDEIR PAGE 72: Project Characteristics:**

- Stadium field lights;
- **NEW!** Storage building with a standing, viewing platform adjacent to the homebleachers;
- **NEW!** Parking area with 35 standard spaces east of the existing swimming pool;
- **NEW!** Parking lot with 76 standard spaces replacing the existing tennis courts south of the stadium
- **NEW!** 18-foot drive aisle connecting the existing main campus parking lot to the north
- **NEW!** pedestrian walkway.
- **NEW!** a 20-foot driveway providing access to Morse Drive and the existing access to the baseball field parking to the east;
- **NEW!** Replacing light fixtures at the swimming pool.

**COMMENT/QUESTION/PROBLEM:**

- Please provide detailed (specs, measurements, boundaries) to allow decision makers to make appropriate decision making rights and mitigation measures. NONE of the new projects are stable and clearly defined enough to provide any level of meaningful feedback.
- What are the specs for the standing and viewing platform? How do they connect with the existing bleachers?
- Can you provide the traffic circulation plan for accessing the new 35 standard spaces? Can you show us Emergency Access Routes?
- Can you outline what is wrong with the tennis courts? How would the proposed Parking Lot (76 spaces) not violate the Scenic Highway guidelines?
- What is the design plan for the 18 foot drive aisle? Ingres/egress of this aisle are highly connected to baseball gate access and the back entrance off highway 1 – how does this improve traffic circulation? How is this safer?

4

**3). COMPARISON OF SCOPES Of Work FROM DEIR TO RDEIR (ALL NEW)**

- CUSD has not properly notified previous "commenters" that this RDEIR has so many "significant" changes that previous comments received on the original draft EIR will not receive a response or be addressed in the final EIR (page 22).

**PROBLEM: Project Objectives is stated as "Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds. You are misleading and not disclosing the accurate Environmental Setting of the chronic challenges you currently have on the campus. QUESTIONS:**

- Is there a prior traffic study with traffic circulation recommendations done by Keith Higgins when the Performing Art Center was completed?
- Is the traffic circulation on the main campus parking lot limited by one-way traffic flows? How will additional parking spaces improve traffic circulation. Can you show current traffic circulation and what are you trying to improve and how you are achieving that? Can you provide further Level of detail for effective decision-making?
- Can you include visuals of pick-ups and drop offs during school hours. Can you show the current cue lines? Principal Lyons and school board members are aware of the challenges of the current on-campus traffic circulation causing potential fire and safety violations. This can't be improved because the land / size of the parking lot is fully developed and there is no more potential for growth. Can you provide further level of detail for effective decision-making?
- Can you include the DSA approval of Performing Art Center, Science Wings and Pool in the next version of the EIR for reference of how the design took into effect parking and traffic circulation design? Why are there are no 810 Fire and Life Safety forms showing Emergency Access Routes? This was a significant miss during the planning phase that is now causing problems on traffic circulation. Why aren't the plans complete?

- Do you have any reference or valid, credible reports stating you have safe traffic circulation on your campus?
- Have you heard of theThe Institute of Transportation Engineers (ITE) who is an international educational and scientific association of transportation and traffic engineers and other professionals who are responsible for meeting mobility and safety needs? What subject matter experts are you working with to bring credibility, measurement and outcomes to traffic circulation?
- Why are you overly focused on parking spaces (which even with new spaces, that is not enough to accommodate students/staff) but neglecting to improve traffic circulation? How do your new parking lots help circulation – don't they actually complicate traffic circulation with several dangerous intersections?
- Please comment and provide level of detail:
  - **Where are the** Transportation planning and engineering concepts for improving traffic safety, circulation, and access? What is your plan for providing more concrete details for decision makers?
  - Why haven't you identified alternative solutions for improving safety and reducing congestion other than new parking lots?
  - Have you identify geometric design approaches and traffic controls (e.g., signs, signals, markings, adult crossing guards) needed to implement a safe and efficient school site circulation plan?
  - Where do you have any signs, signals, markings, adult crossing guards? Is the campus safet?
- **MITIGATION MEASURE:** requesting a comprehensive **Vehicular Access and Circulation Study** with the goal of evaluating and providing alternative solutions for addressing **ongoing** safety and congestion concerns. You are skirting addressing the core root cause of your traffic circulation issues. You must act responsibly for the safety of everyone who is on that campus.
- Why have you not undertaken a **Vehicular Access and Circulation Study** for your day-to-day challenges at the high school years ago with the heighten complaints from neighbors?
- We are requesting this now given the significant concerns on Emergency Access Routes and your further reckless behavior to introduce more activities under nighttime conditions. It is irresponsible to for you to not have addressed it with the chronic day-to-day challenges (on record). This is a serious and valid request that captures a baseline to the Environmental setting and is critical to address Fire Access Routes. You've introduced a significant new body of work that didn't go through a Scoping Session. You have discovered the need for a Vehicular Access Study. If you had done so. We are talking about the basics of human safety.
- If safety of students, staff and attendees are in question, why are you sidelining all discussions through a legal process? Have you considered a community working group to problem solve issues? How much money have you spent on legal fees for this project?
- Are you aware the Vehicular Access and Circulation Study should be done during school starting times, end times and a handful of football games with high attendance?
  - Have you identified, determined any Existing Issues/Issues?
  - Have you determined any Short-Term/Long-Term Enhancements to Facilitate Traffic Flow?
  - Why haven't you Obtain Community Input via an Online Survey (include ALL residents within 1 mile of school on both sides of Highway 1 (what you recommended as walk distance)?
  - Where does CHS stand in the potential of Identified Issues below?
    - Do you have any Significant Vehicle Queues (internally and on public roadways)?
    - So you are not aware of consistent Illegal Turning Movements ?
    - You haven't received feedback on Improper Lane Usage, especially on the cue pick-up lanes?
    - Hasn't there been an abundance of complaints on use of Improper Drop-Off and Pick-Up Areas? Photo presentation shows this is significant.
    - What is your Bus vs. Parent Vehicle Ratio?
    - What is your Bus vs. Parent Vehicle Segregation metric?
  - Why not develop and field an online community survey? Have you considered that questions might include:
    - Driveway Access
    - Arrival/Dismissal Times
    - Bus Traffic
    - Non-Bus Traffic
    - Pedestrians
    - Crossing Guards
    - Traffic Control and Enforcement
  - Have you heard of and/or considered such traffic circulation studies? Links to similar studies include:






- [School Vehicular Access and Circulation Study Conestoga High School](#)
- [PEDESTRIAN AND VEHICULAR CIRCULATION STUDY FOR LA SALLE HIGH SCHOOL](#)  
[Glens Falls School District Traffic Circulation Study](#)

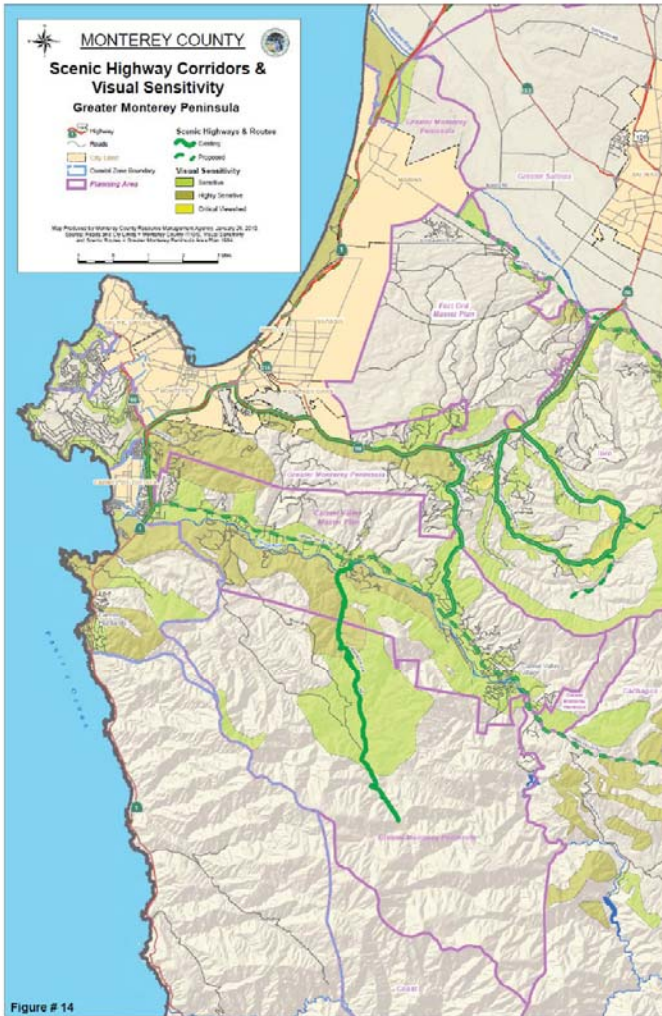
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**PROBLEM: Why have you not shown the full impact of the light pollution for informed decision making? RDEIR didn't conducted a proper analysis of the impacts of the Project's light and glare. Effective Mitigation Measures can only be recommended if the following information is provided: QUESTIONS**

- Why are you limiting the map to only a 3.5-mile radius on page 127/RDEIR? Show full impact of the light spill until zero from all elevations and angles.
- Appendix F: Page 3, can you zoom out with this simulation until it goes dark/black so we can see the light spill?
- Appendix F: Page 5, can you re-select the 13 sensitive receptors to those with highest impact, not lowest?
- Appendix C: Page 10, can you keep zooming out until we see all points at zero?
- Can you provide what a 9 PM photo simulation from the 1847 green dot (that is the honest view of the visual impact to protected Scenic Highway 1)?
- What nighttime conditions are you simulating?
- Can you install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day? If you refuse, what is your stated fact of why not?
- Appendix C: Light Data page 63: Can you track what will be the stadium lights on this spectrum?
- You reference Scenic Highway Corridors & Visual Sensitivity Map (Figure #14), so can you include it for all stakeholders and decision makers to be informed Also, you can get this map and the data behind in and zoom into the project area?
- Are violating a lot of Sensitive, Highly Sensitive and Critical Viewshed areas? How can we tell if you don't drill down in the sensitivity map?
- Can you provide the complete and accurate Agi32 photometric predictions for the project at all elevation levels as well?
- Have you done a full analysis of why portable lighting systems that use on-site electrical aren't a viable option for mitigation measurement? Who do you use as referees?

#### Visual Sensitivity

-  Sensitive
-  Highly Sensitive
-  Critical Viewshed



**Your Mitigation Measures on: The Impact 5-2. New Lighting** would still 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 (Remain Significant and Unavoidable). However, you need to be more accurate in your input in the following ways: **QUESTIONS:**

- Mitigation Measure 5-2a is only about 44 Games: The environmental impact is caused by the 400 practices and 124 games referenced on page 35 and page 103. Why are you not addressing the complete impact of when all the stadium lights will be on? Update your information accurately
- Mitigation Measure 5-2b is not legally binding and policy can be changed with every new superintendent/principal/school board member (7 Superintendents in the past 7 years). In addition, the pool has been completed since 2007 and CUSD has not demonstrated the ability to be credible with putting such a policy in place given it has rented out the pool more than 75 times to non-school related organizations. Can you provide the confirmation this is true from both the CPRA request in 2021 and the December 2021 Community Listening Session?
- Mitigation Measure 5-2c needs further clarification. Why can't we see an energy specialist now – not for the light pollution for the energy use? How will CUSD planning on purchasing the electricity for these lights?
- Mitigation Measure 5-2d our understanding is that Dark Skies will not certify stadium lights within a certain distance of residential housing. Can you verify this claim?
- On Page 104 you show the Table 4-3 Proposed Stadium and Pool Facility Lighting Schedule, but the RDEIR doesn't acknowledge the cumulative impact of both lights being on. Can you expand all lighting data including Appendix C to show cumulative damage of light pollution when both lights are on?



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- In addition, clean-up the table and be specific on number of days that both lights will be on and show a total of number of days lights will be on. Without this level of info, it hinders our inability to accurately determine when they would be used

**PROBLEM: Why are you shrinking the assessment study area to a narrow geography immediately adjacent to the high school? For effective Mitigation Measures to be identified, the following information must be including your EIR:**

- Why not include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. Then, the expectation is that the RDEIR should include all impacts across all above areas in each of the analysis: aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality? Please include in the cumulative impacts as well. Level of detail is needed for effective decision making.
- Carmel-by-the-Sea is literally less than .2 miles from the legal boundary to the front entrance of CHS. CHS is the entry point to all the tourists visiting out of the area. Carmel is a celebrated destination for site-seeing, shopping and dining, and a mecca for golf enthusiasts worldwide, attracting over 8 million visitors to Monterey County per year. Have you considered the economic impact to the city? Have you reviewed their General Plan? Are you aware you are breaking many of the General Plan components as a Sphere of Influence?
- The Point Lobos Foundation is the sole source of funding for the model volunteer program, protects the Reserve's environmental health and historical integrity by funding work on trails, facilities and vegetation, and continuously strives to improve programs and services for approximately one million visitors each year. Are you aware of their CEQA around ParkIT and the new parking lot at the corner of Rio and Highway 1? Why isn't this part of your cumulative report?
- Given the environmental setting sets the baseline physical conditions by which a determination can be made about an impact and its significance, why aren't you including all impacted geographies mentioned above? You must.

**PROBLEM: Why don't you provide full and consistent disclosure on how many practices and games the light will be on? Decision Makers must have clear understanding of the inputs and they should be properly applied in all aspects:**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games) Which is true?
- Is the truth is on page 103 with up to 400 practices and 124 games? Why isn't this total part of the Mitigation Measures and included in your VMT analysis? That is "worst case only" – Why?
- You are also inconsistent from the DREIR (37 Games on Page 21) to changes in the RDEIR – mistake? Which one is accurate and why?
- Why not include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact. Do NOT limit to "worse case" scenario of six football games. That is NOT accurate. Include it ALL.
- You are planning to have soccer games come to the High School, so isn't your attendance is under-estimated? Provide an accurate basis for all estimates of attendees to the games.

6

**PROBLEM This RDEIR includes significant NEW expanded construction projects.**

- Why are there are no details to any of the new plans? Concepts are unstable; thus we can't provide feedback.
- Re-start community engagement with a legally required Scoping Session. Original Scoping meeting was not published and was during COVID.
- What is your next date for updating the Facilities Master Plan and develop a responsible phased long-term growth approach?

7

**The Notice of Preparation as several areas as "Potentially Significant Impact" and yet you increased the Scope of the project and provided NO Mitigation Measures of how that environmental impact was mitigated to shift the impacts to less than significant:**

- **PROBLEM:** You are underestimating: Biological Resources. With the entire new scope of work, shouldn't there be another letter from CA Department of Fish and Wildlife in the RDEIR? You said everything was "tossed" out from the previous DEIR. What happened to the owls? Is there any red legged frogs?

#### 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"/>

- a. **PROBLEM:** 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. Please provide the following for more appropriate Mitigation Measurements to be identified:
- What are the specific eight special status species referenced above?
  - Why focus on just the Bats, Nesting Raptors and Migratory Birds?
  - Can we see Figure 7-2 more zoomed in to the project site? We can't tell the true colors and zone implications. How do we know what is in danger without a level of detail for specific decision making?





## 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.

### PROBLEM: Lack of energy details on Energy: QUESTIONS:

- Where will CUSD buy electricity from to power the lights? Aren’t we in crisis and brown-outs in California? Can you provide level of detail needed for effective decision making?
- Is there a long-term energy plan for powering and usage of the lights that are more “green friendly”
- We’d like to review this e-mail (Page 231): *Electricity is supplied to the campus by Central Coast Community Energy from 100 percent renewable sources (Dan Paul, e-mail message to consultant, July 6, 2021). Can you provide level of detail needed for effective decision making?*
- You indicate that *The primary sources of energy demand will be from increased transportation fuel use and electricity use. Associated demand and related issues are summarized below* – and yet you don’t address what were the concerns in the NOP. Why just transportation fuel? The lights use energy themselves. Where is the analysis on that?

## 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"/>

### PROBLEM: How did the NOP “Potentially Significant” points move to a non-issue? Please provide the following information for a more fully informed decision making process: QUESTIONS:

- **REQUEST:** Accurately reflect ALL the inputs. If the net change in operational GHG emissions will be evaluated based on the Change from existing stadium use to post-project use and increase operational GHG emissions from transportation sources will occur, you must include ALL increased athletic sports in the roll-up. You are limiting the analysis to just 6 football games or “worse case scenario” – please include all data. Why are you doing that?
- **REQUEST:** You increased scope of PARKING LOTS. Please restart project with Scoping Session if you want new parking lots / viewshed, etc. Otherwise, the number of new parking spots daily must be considered in your new roll-up of GHS. We can consider these were students walking to school everyday that are now being encouraged to drive since parking

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con't. | is now available on the campus. Same with staff and others. Perhaps they were carpooling, etc. Either way, you must reflect new parking lots in all your metrics (including transportation VMT, etc, if that is official to your proposal).

10 | **PROBLEM Why do you never show us the existing and proposed Emergency Access Routes? Mitigation Measures to improve or meet your objective of circulation traffic and emergency access route can't be done without more information: QUESTIONS INCLUDE:**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects. Why have no 810's been attached and how did these projects get approved by DSA?
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.
- Please provide what Emergency Access Routes are currently in place? Shouldn't this be on ALL plans?
- How would those Emergency Access Routes change ESPECIALLY with all the new proposed scopes of work from new parking lots, walk-ways, etc?
- Given you are trying to improve circulation traffic on the main parking lot, can we have the emergency access route for the main campus as well? Need description of emergency access route, how wide, radius of turns, if dead end where is the turn around, how would it be marked, fire hydrant location

11 | **PROBLEM: You don't disclose what is wrong with the tennis courts and if repairing tennis courts isn't a more viable solution to address your objectives. What needs to be fixed and what is the cost estimate? If Costs are not considered a part of CEQA then why is "on-budget" one of your objectives?**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. You haven't accurately accounted for the travel miles to CVAC and Mission Ranch.
- Tennis Courts are visible from Scenic Highway 1. If you replace them with Parking lot don't you violate the Scenic Highway 1 Protected by the Corridor Program?
- **MITIGATION MEASURE:** Request you conduct a Visual Impact Assessment (VIA) and Scenic Resource Evaluation (SRE). These studies are used to predict the degree and type of impact proposed transportation projects will have on the "visual" environment. Can you confirm you understand the legal requirements to uphold the Corridor Protection Program for Scenic Highway 1?

12 | **PROBLEM: Figure 7-1: Habitat Map shows trees lining Scenic Highway 1 are in jeopardy but no Mitigation Measures are provided in a meaningful way:**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements. What is the specific space between trees, new parking lot?
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots. Will trees be removed?

13 | **PROBLEM: You have started a separate workstream to address Late State outside of CEQA (not appropriate inclusion). Mitigation Measure: Fast-track the adoption of "Late Start", a CA State Law benefiting all students. I don't think late start is a CEQA issue – why is it referenced in the report?**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers. Can you please include all references of work done to date on behalf of CUSD including the Transportation Report presented to the School Board 2022. What are your next steps and milestones with Late Start?
- Please include all the Late Start workstreams you promised during special sessions.
- Why are you not separate out this workstream? It's not a construction project and not part of the 4.2 Project Characteristics.
- Can you provide a comparison of your bell schedule with Monterey Peninsula School District who has been able to implement Late Start without Stadium Lights? Why can't CUSD also do the same? If you are going to include Late Start in this RDEIR it has to be inclusive of all information in order for Decision Makers to have enough information to be fully informed.

14 | **PROBLEM: We believe that Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation measures.**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).



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- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- What is the goal for number of parking spaces CHS should have? What reference are you using for that goal? If you are short of that goal what are your mitigation measures? Can you shift grade schools down to CMS for improving traffic circulation at CHS? Isn't the campus bigger 60 Plus acres?
- What is the parking policy at CHS? For instance can only seniors drive to school? How many students are registered drivers? Does staff have to register their cars? What is your accurate ratio of registered cars to available parking spaces currently at CHS?
- Can you reference any local Monterey County requirements the school must follow regarding parking to event ratio?
- What programs do you have in place now to encourage walking to school?
- Have you evaluated other areas such as amphitheater and re-locating baseball field that could increase parking spaces, improve main parking lot circulation and not impede Scenic Highway 1 protected visual aesthetics? Why are those not good choices? Why haven't we seen more options that don't crowd the campus? Oh wait, you skipped Scoping Session!
- Have you evaluated both traffic circulation and parking solutions together? Seems like number of parking spaces is not the only problem. A Scoping Session would have been beneficial to capture community input.
- What is your traffic circulation plan for any of the school events? All photos provided show you are violating Fire Lanes and impeding Emergency Vehicle Access.

15

**PROBLEM:** Bleachers: Current bleacher capacity is 1,081(page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes? Are you currently violating fire code?

- In addition, you block fire and emergence access to the flow of the stadium on day-games (photo provided in separate e-mails). What measures do you take to ensure emergency vehicles can pass? Should you have parking attendees at all athletic events monitoring proper parking? This is not a problem for football games but all sports. What is your plan when you move soccer, etc to CHS?
- Also, I have provided a full second and separate comment section on Transportation and Parking. Carmel High School has not acknowledged the chronic problem they have been neglecting for years. Where is the transparency – provide complaints from neighbors and community since 2013 close to when the new construction was completed on the performing art center, pool and science wing. There was no CEQA process or filed Notices of Exemption – thus no filed 810 DSA forms for Emergency Access Routes.
- Parking spaces and proper planning as been completely ignored by CUSD over the last 20 years. Provide historical plans or mitigation measures if this is not accurate? What types of analysis or studies have you conducted to ensure proper traffic circulation (on campus) or parking space requirements?
- Why can't you provide a more thorough Environmental Setting that provides metrics to traffic congestion, complaints from neighbors and the amount of law enforcement violations within 1 mile radius of the high school? Are you hiding honest benchmarks for effective decision making?

16

**PROBLEM: Why do you fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

17

**PROBLEM: You continue to think short-term band-aids vs. long-term solutions.**

**MITIGATION MEASURE: Assess CMS as viable solution and provide enough information to properly comparing it to CHS over a 3 / 5 / 10 year plan.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
- **YOU STATE on Page 358: Master Planning at Carmel Middle School**  
*In 2011, the school district studied constructing a stadium complex at Carmel Middle School, but the space required to accommodate such a stadium was determined to be infeasible given space requirements. The estimated cost in 2011 was*



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\$24 million. Subsequently, the school district acquired the adjacent, undeveloped property and in 2019, prepared the Carmel Unified School District Facilities Master Plan (2019 master plan) which provided for a revision of the Carmel Middle School campus athletic facilities to maximize outdoor learning and playfields for all students across the school district. This revision included the potential for up to six baseball or softball diamonds, two soccer fields, a lighted outdoor track and football field, four outdoor basketball courts, eight tennis courts spread across the extent of the existing middle school campus (see Figure 5.9 of the 2019 Master Plan, included as Figure 18-4, Carmel Middle School Proposed Master Plan Diagram (2019 Facilities Master Plan)).

- **However, you provide little detail for the decision makers to have an informed decision. Full information and disclosure should include:**
  - Provide a copy of what the school district studied in 2011 when studying construction of a stadium complex at CMS?
  - What specifically about the space determined it to be infeasible?-
  - You state an estimated cost of \$24 MM. How was that cost arrived? One field, all fields, lights, turf? Can we see the breakdown?
  - You can't dismiss CMS as a viable option without the details for us to assess whether it is viable or not.- The study was conducted in 2011 but the additional property purchased post 2011. Why are you not the study be revisited?
  - What current work has been done for the new purchase of 8.32 post 2011? Please provide all assessments since purchase for decision makers to be fully informed.
  - You've stated several times that these improvements would cost upward of \$72 Million dollars, yet provide no basis for how that estimate was arrived at? What is the scope? Could the scope be scaled down to one football field with lights? Please attachment and questions on where are you specifically indicating to locate the field?

18

**PROBLEM: Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan?
- *Can we have this now? Seems like basic good Traffic Management: The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - Updating required school area warning signage
  - Consider posted speed reductions down to 15 MPH in school areas
  - Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps
  - Exploring additional stop sign controls at intersection

**MITIGATION MEASURE:** request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**MITIGATION MEASURE:** Request that CUSD immediately implement TMP identified on Page 18 of Appendix K.

19

**MITIGATION MEASURE: CUSD Must Work with residents to protect their residential streets with permanent long-term No Parking - Residents Only Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- How are you not creating a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs?
- Facilitate a meeting with residents and District Supervisor Mary Adams and Monterey Public Works for long-term solutions. Demonstrate pro-active leadership to bring community together for resolutions versus creating friction. You are introducing a problem be part of the solution. What discussions have you had to date with District Supervisor Mary Adams and Monterey Public Works? Is their feedback reflected in this document? What was the discussion around parking restrictions?

**Mitigation Measure 11-4.** The proposed Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a superficial, flawed short-term fix for a handful of limited nighttime football games. The proposed



TMP creates confusion in law enforcement between event attendees vs. residential parking, causes a nuisance in residential parking limiting our streets. Most importantly, the RDEIR doesn't acknowledge or address the existing chronic problem of inadequate parking and the lack of transparency for existing Emergency Access Routes. This problem currently plagues the CHS campus and surrounding environment on a daily basis.

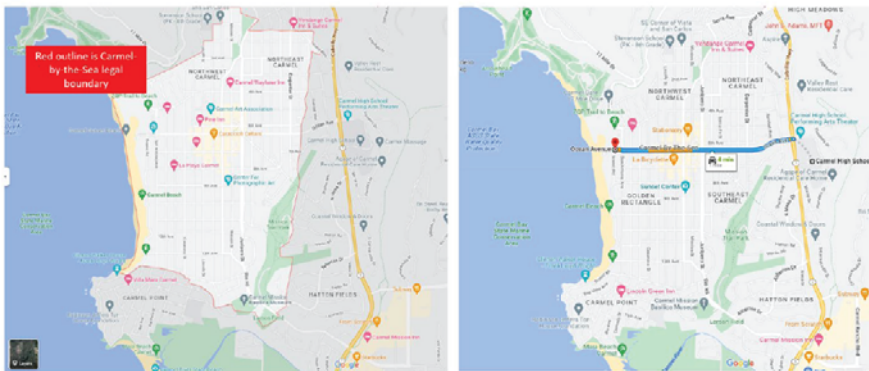
**SOLUTION 1: Why can't we have** clear and transparent Emergency Access Routes for all campus activities (current campus activities plus potential impacts from all proposed new athletic practices/meets/games - football, soccer or anyone using the stadium with lights)?

**SOLUTION 2: Why can't we have** Community Engagement within 5 mile radius of campus (includes east and west side of Highway 1) and the Monterey County Department of Public Works, Facilities and Parks for a long-term viable Traffic Assessment Plan to include long-term "Resident Parking Only Signage"? Why can't this needs to be done BEFORE any approval of a EIR for credibility?

**APPENDIX B: NEIGHBORHOOD PARKING ASSESSMENT:** Insulting to indicate residents surrounding the east side of CHS as "ample parking". Can you provide parking assessment to the West Side of Highway 1 where the overflow will go based on your Traffic Management Plan (TMP)? Also Appendix B validates that you are anticipating attendees will park here (Why can't SOLUTION 2 be executed NOW)?

**APPENDIX B: NEIGHBORHOOD PARKING ASSESSMENT:** on Page 4 you state: "Using the City of Carmel by the Sea's requirement for standard parking size dimensions"...that's great, you acknowledge that Carmel-by-the-Sea's legal boundary is less than .2 miles from the front of Carmel High School. You also indicate you encourage walking to the to school events. Why didn't your parking assessment include all the streets within walking distance? Update the Parking assessment to all streets on the west side of Highway 1. Why isn't this included but not limited to all the streets indicated below? Please provide.

In Appendix B: You state "Using the City of Carmel by the Sea's requirement for standard parking size dimensions"...  
Also in RDEIR, you indicate: Mitigation Measure 11-4Page-40: 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  
REQUEST/COMMENT/FEEDBACK: You MUST assess the parking and environmental conditions within the 1 mile you are suggesting alternative and recommendations for...all of Carmel-by-the-Sea must be park of the environmental setting AND all streets in the second MAP must also be included in the APPENDIX B: Parking Assessment.



**SOLUTION 4: Why hasn't** a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel been established to date?

**SOLUTION 3: Have you defined long-range goals for facility planning given CHS is geographically land-locked within a 22-acre campus with no viable solutions for daily parking whereas Carmel Middle School has 60-acres permitting safe and responsible growth? What are the elevation differences between the two campus? Would the light pollution be less at CMS?**

**Mitigation Measure 11-4: Supporting facts that the proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**



- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates. You experienced inconsistent permit permissions for your attempt this year during day games. Provide the facts.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball). How are you currently estimating attendees from any valid sources?
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (What is the context of how this school compares to CHS, # students, campus size, parking, etc).
- Inputs and outputs are inaccurate and based on limited football games whereas RDEIR highlights significant increase in attendees for all games soccer, la cross, etc. (page 103, 124 games). Why aren't all games being included? Soccer games are a mess in large attendees, parking challenges, etc. Moving that to CHS would introduce significant traffic congestion and parking problems.
- RDEIR & Appendix K reveal that even with a low estimate of parking demand, CHS can't absorb the critical gap of 314 spaces. (page 33). This is a problem with current day-to-day. What is your mitigation plan for more than football games? Without accurate attendees how can they even anticipate parking needs?
- Why do the Appendix K numbers for the estimated parking space demand (463 pg 5) conflicts with total estimate provided in the RDEIR (617 page 33)? What is your accurate estimated parking space demand?
- TMP encourages walking and biking to games to reduce the parking demand and yet acknowledges "There are no sidewalks or bike lanes along SR". So how are you encouraging the behavior without that being physically possible?
- Appendix K (page 8) admits **significant intersection operational deficiencies were observed** at the beginning and end of the school day at the intersection of SR1/Oceans Drive, yet no mitigation measure. This observation is for day-to-day not even the anticipated increase in attendees. If you are admitting it, what is your mitigation measure?
- Appendix K numbers conflict with RDEIR for estimated number of attendees: 1,500 attendees (RDEIR pg 104) to 2,000 attendees (pg 12 Appendix K). What is your formula for estimating attendees that are valid inputs directly related to CHS? Where did you get those numbers?
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage". What is your plan here? As we have stated numerous times, people want to park as close as possible and as you state it is voluntary, not enforceable so people will park in the neighborhoods.
- On-site amenities and on-campus supervision sections include no details (how many supervisors, stationed where, doing what, etc). Who are the traffic control monitors?
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems. What do you propose for those blocks that are in walking distance?
- In the Parking Management section for the west side who will have "No Event Parking Signs" - it's unclear how will law enforcement know the difference from residents vs. attendees? No proposed solution. Can you provide a level of detail for effective decision making?
- Is the school creating a Public Nuisance (Penal Code 372 & 373a PC) if residents can't consistently park on their own streets because of "No Event Parking Signs" and are vulnerable to ticketing? How is it safe for residents to have events and also have visitors deal with event traffic?

In addition, the first DEIR stated: Nighttime Events with **SIGNIFICANT: Potential Emergency Access Issues** (page 26).

On page 40: The RDEIR recognizes: *An Increase in Event Attendance Could Result in Inadequate Parking During Limited Nighttime Events with Potential Emergency Access Issues.*

However, the only mitigation measure that CUSD provides to move the impact to "less than significant" is a flimsy, unproven "voluntary" traffic mitigation program that has no merit to work or holds attendees accountable to adhere if it is not followed and is further outlined. Appendix K is referenced. CUSD no legal authority to stop people from parking where they want not only surrounding the high school but also on the west side of Highway 1.

CUSD requested an Encroachment Permit: Record 22EP0302 from Monterey County Public Works to place, maintain and remove temporary "No Parking & No Event Parking Signs" See attachments marked "Encroachment Permits". The attempted Traffic Control Plans were for the dates of 8/27, 9/17, 10/01, 10/29 and 11/05.



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con't.

The execution of the TMP was a failure both on 8/27 and 9/17. Feedback was given to CUSD in e-mails and photos (showing blocked emergency vehicles). Where is your recap of what is not working?

21

Sat, Sep 17, 12:45 PM

to Jonathan, Seaberry, Anne-Marie, Sara, Tess, Karl,

Hello Jonathan,

Yes, I did see you hustling today to help with the traffic and parking at today's game. However, you forgot to notify the neighbors of the "No Event Parking" signs. How is law enforcement supposed to tell the difference between attendees and residents? What if one of the residents was having a kid's birthday party and needed the street parking for a party?

Also, I keep emphasizing safety, safety, safety – not sure why this is not a priority for anyone on this e-mail? Your "ticket stands" are blocking the only access for emergency vehicles. You may want to re-think that. If a child was injured today – you are jeopardizing life safety.

I have alot more notes that I will submit in very detailed form for the DREIR - there is no way you can move to less than significant impact even with mitigating measures. You are a land-locked campus that did not properly plan for growth. As the first DEIR stated: Nighttime Events with SIGNIFICANT: Potential Emergency Access Issues

I hope the students won the game despite the adults not taking safety as a serious topic.

On Wed, Sep 7, 2022 at 10:10 AM wrote:

Jonathan,

Congrats on the Padres win at the Shoe Game. As many of the residents noted last night, school spirit seems high and winning games are possible without stadium lights. Please clarify the one statement you made last night: you believe that the "No Event" parking mitigation attempt was successful? Please expand on those key points so that the board can be properly informed. This is one of the "feeders" into the RDEIR What we witnessed:

- You did not properly notify the California Highway Patrol or the broader Monterey Sheriff's Office.
- Folks did indeed park on Morse Drive and it was complete chaos on who should be ticketed and why. (one photo attached - the neighborhood has large file videos if you want us to send)
- The Monterey County Sheriff on duty only ticketed half the cars: Section 22504 - Stopping, parking, or standing upon highway in unincorporated area
- People departing the game were angry half the cars were ticked and half were not "Why me - Why not him"
- When the California Highway Patrol arrived, they clearly communicated they were unaware of any "No Event Parking" plan.
- CHP pointed to the conflicting unapproved "No Event Parking" signs you put up right under the real legal signs (complete conflict with each other and one being "fake and unenforceable" (Photo attached)
- The residents were conflicted. How are you supposed to tell the difference from resident to event participant?
- You completely ignored the other side of Highway 1. So, everyone jammed those residential streets and unsafe crossings were happening from Hatton street (no sidewalks) to Ocean Ave to try and get to the cross-light.

If all the above was happening at night - oh my - please don't tell me that wouldn't be a safety disaster. Please also remember, there is a new crop of students every year. This is not something that is perfected and you've got it down pat. CUSD has no jurisdiction on the surrounding streets of CHS. You kindly remind us you have no jurisdiction when it works to your convenience.

Speaking of which, you've indicated that the neighborhood needs to work more closely with law enforcement to enforce the signs that are already in place. You've pointed to the fact the SRO (that you pay for) is empowered to write tickets - especially near North Carmel Hills. In speaking with the SRO, he confirmed - he is off the clock by 3 PM when the afternoon pick-up chaos begins.

22

**Mitigation Measure: Why can't you fix the light pollution emitting from the pool lights you installed IMMEDIATELY? Isn't a CEQA process for potential environmental impacts? This would be an improvement, no? Why are you delaying that and making it complicated by including it in a CEQA process? There is no impact to the environment just an improvement. Why include in this process and hold it hostage for execution for approvals of stadium light. Unfair political move and demonstrates no trust in CUSD partnership.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise. Why is this included in the RDEIR? It's an easy step to fast track solution now, so why complicate? It should be win/win.
- If the data is that significantly an improvement to the environment, why is this part of the CEQA? Just do it already?
  - The resultant maximum candela for the existing HID lights was about 44,000 candelas existing at grade, and it was about 80,000 candelas existing taken at 15 feet below elevation
  - The resultant maximum candela for LED was about 17 candelas at grade and 341 candelas at 15 feet below elevation
  - The proposed pool light fixtures, therefore, represent a decrease of 43,983 candelas at grade and 79,659 candelas at 15 feet below elevation.
- What have you been doing since 2007 to minimize neighborhood lighting nuisance by greatly reducing local spill and glare?
- How are you managing high angle light pollution, thus dramatically decreasing off-site light trespass and sky glow
- Poor leadership decision not to immediately mitigate neighborhood light pollution and sky glow, which will benefit the environment, the astronomy community, and others impacted by poorly designed outdoor sports facilities; and Minimize lumen densities, thereby reducing energy consumption.

23

**PROBLEM: Why don't you include the baseball field as part the Environmental Impact and Athletic Improvement Assessment. That is even closer to the stadium than the pool which is part of the RDIER. The baseball field has significant implications to parking, traffic circulation, etc**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Why isn't pedestrian access up the backside of the stadium being assessed with that closed off stair case?
- Can we see more options of including the baseball field? Should that be moved to CMS? How many practices/games/students are involved in baseball? What are these athlete's VMT's to fairly compare if tennis students should be "punished" by having their courts removed and/or understanding if baseball can relocate to CMS?
- Is the baseball field rented out to outside groups?
- You changed the RDEIR to "athletic" improvements and included the pool. It's fair to also include baseball fields/players, etc in the evaluations of improvements and/or moves?
- Can you confirm that the current gate access lane is approved as an Emergency Access Route? Can vehicles safely fit there? Week of September 12<sup>th</sup> 2022, a contract was approved for boundary survey from Whitson Engineers on possible encroachments. What was the outcome and how does this impact designs that are part of the RDEIR?





24

**PROBLEM: You don't provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1. Are you proposed plans in violation of this? Can you provide specs, distances and clarify how you are not violating any aspect of the Corridor Program?
- In addition, the proposed new parking that rips out the tennis courts is visible from Scenic Highway 1. What are you doing to not violate this policy?
- Clearly know you are breaking local zoning and ordinances by proposing construction so close to Scenic Highway 1. Can you clarify the aspects of the program that are in jeopardy when your plan is overlayed to Scenic Highway 1? Are deliberating trying to be fuzzy with the details?

**MITIGATION MEASURE:** Will you be following all outlined guidance on the requirements to the [protected Corridor Program to include:](#)

Will you conduct a Scenic Resource Evaluation (SRE) and Visual Impact Assessment (VIA)

Are you aware CEQA scenic quality and aesthetic issues be considered when determining environmental impacts and SRE and VIA are conducted to satisfy these environmental requirements?

Are you aware these studies are combined into one technical report with the SRE presented as a subsection in the VIA? Since these projects require early coordination with the Project Development Team (PDT) and representatives from the affected community, have you started this process?

Will you be conducting community participation through public meetings and surveys are recommended tools in predicting viewer response to proposed changes in the visual environment?

Since budget and time constraints often limit the use of these methods, have you determined community values and goals by other means such as examining city general plans and meeting with local planning staff?

Have you considered close coordination with the PDT member who is working on community impacts and the environmental planner/generalist is critical and efficient?



24  
con't. This coordination should be underway at the project initiation phase in the event that potential project impacts would require the PDT to consider design alternatives or mitigation measures that would affect project funding levels. Have you discussed these issues with other agencies, such as the California Coastal Commission, that will have an interest and stake in the outcome. Early coordination between the Department, the community, and other agency stakeholders facilitates timely and efficient project development.

25 **PROBLEM:** Cell towers are notoriously known to be hung on stadium lights.  
**MITIGATION MEASURES: Become involved in groups such as this: <https://stopcelltowersincarmelneighborhoods.com/>**

- What is CUSD's plan if cell towers are a possibility to be part of the stadium lights?

26 **PROBLEM: Why are all your photos of KOPS are consistently taken at the lowest point of impact?**  
**MITIGATION MEASURE: We want the highest impact points for decision makers to be fully informed. You've highlighted many of the areas that are high impact. Why are you not showing us below?**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?
- The sensitive receptors were chosen with bias.
- Show more photos of the public spaces that will be impacted. The community walks and uses the track field during the day. Why not lots of photos from than angle?

27 **PROBLEM: You don't include detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

28 **Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Lighting experts at the Special Meeting indicated that Musco does large stadiums and is providing an over-kill lighting solution. Established in 1906, the Illuminating Engineering Society is the recognized technical and educational authority on illumination and the speaker during the Special Meeting indicated you should partner with them for vendor evaluation and options that included lower lights.
- **SOLUTION: Provide a range of options and solution for vendors and bidding process.**
- What is the standard height of other high school stadium lights? We heard 30 or 40 foot high versus what you specified.
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13. When will that be used, how often and under what conditions? What is the lighting experience in this? Where is it in the cumulative effect and comparison to the steady state of the lights?
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

29 **PROBLEM: In a December 2021 Listening Session to the Community, Ted Knight promised several mitigation measures outside of the CEQA process and several not included in the RDIER. Please provide follow-up to the promises (one of the key slides provided but the Entire Presentation should be included in the RDIER:**

- MOU Referenced in the Slide: False statement of his hours, duties and responsibilities. Contract indicates weekdays only and ending at 3 PM right before school ends so he can't enforce traffic and parking violations.
- Board Policy 1330 has not been revisited and there are no details in the RDEIR.
- Dark Sky will not certified with a specific distance to residential neighborhood.
- Please specific what "green building" light efforts have been taken as photos of back of school indicate significant light pollution as bad as the pool lights.
- You promised the feasibility of a story balloon to demonstrate the heigh of the light poles. RDEIR includes no update. A Balloon Test or some other accurate physical (3D) representation of the visual impact is needed especially for day-time.
- Where is the plan for a fee-based video service to Televisе events to help with capacity?

29  
con't.

## Mitigation Plans cont.

- Scheduling of events so there are not multiple events on campus at the same time, where parking would become an issue.
- Increased presence of law enforcement and security at night events - The district has received confirmation that the MOU between the county and state allows our local law enforcement officials, including our school resource officer, to issue tickets surrounding the school. The district is also planning on moonlighting officers for events.
- District legal counsel is currently revising Board Policy 1330 and an updated policy that prohibits the renting out of facilities that require lights will be presented to the Board in Dec, 2021. Currently, we rent out the aquatic facility approximately 75 times a year when lights are utilized. This change in policy will eliminate these rentals and their use of lights.
- The district has applied for dark sky certification and have received certification of the plans. The district will also be applying for field verification if and when the lights are installed.
- The district is currently in the design phase of replacing our current pool lights with dark sky certified lights that we anticipate will be installed in 6-9 months.
- The district has replaced the light bulbs, fixtures, and changed the paint directly below the lights at the back of the school.
- The district is currently assessing the feasibility of a story balloon to demonstrate the height of the light poles, as a story pole is not feasible at this time.
- The district will be partnering with a fee-based video service to televise events that should help with capacity.

30

**Project Objectives you state:** *Provide the capability to host sport events and games for Carmel High School students in the evening when students, parents, and community members can more easily attend;*

- This statement is too broad doesn't address the unusually large geographic range of where student live who attend CHS.
- How do you know that students, parents and community members can more easily attend? There are several key stakeholders that might have different goals and objectives. How many minorities play sports and are they at a disadvantage if they live in the rural areas? How might you be more sensitive and responsible to the complexities of the various stakeholders? You have level of details on minorities from the re-districting effort – why not include that as data input?
- Can you breakdown this into the various athletics? What might be good for football payers might not be good for soccer teams. Are you limiting access for all students to all activities of public education and specifically nighttime afterschool programs?

31

**PROBLEM: None of your Mitigation Measures include a Mitigation Monitoring and Reporting Plan (MMR) with clear Authority to Enforce and Bind and legally enforce any conditions** The mitigation measures to be monitored or the subject of reporting must be fully enforceable through permit conditions, agreements or other measures. The overall thrust of these provisions is that mitigation measures should be implemented. The statute and Guidelines refer to three distinct but closely related concepts necessary to carry out this policy:

- Mitigation measures
- Means of implementing and enforcing mitigation measures
- Means of monitoring or reporting on the implementation and enforcement of mitigation measures

32

**PROBLEM:** You don't clarify what aspects of the local county code you need to adhere to. Clarify how you are meeting the requirements of Monterey County Code Section: 20.58 – REGULATIONS FOR PARKING 20.58.010 PURPOSE. The purpose of this Chapter is to avoid or lessen congestion in the streets and to promote the public safety and welfare by requiring off-street parking spaces for customers and employees and loading spaces for all land uses in the unincorporated areas of the County of Monterey sufficient in number to accommodate all vehicles which will be congregated at a given location at a given point in time by drivers and passengers who use or occupy the facility or area for which the parking space and loading space is provided.



33

**Alternative 4 Alternative Location (New, Lighted Stadium at Carmel Middle School) for Practices and Games:**

- You have not done the due diligence in properly evaluation this option.
- You have not included or acknowledged key factors that make this a more viable solution.
- You can't assert this alternative would result in greater environmental impacts associated with aesthetics; air quality; biological resources; greenhouse gas emissions; noise; soils, erosion, and water quality; tribal and cultural resources; and recreation. You must provide data to make an informed decision

34

- PAGE 32: If stadium lights are needed for Football only (as you state) several of the below are not needed:
  - NOT NEEDED (CAN STAY AT CHS) Track and field event areas (shotput, discus, long jump, high jump, pole vault).
  - NOT NEEDED (CAN STAY AT CHS) Storage for all sports equipment.
  - Clarify what is at CMS now and future costs? scoreboard and sound system.
  - Clarify what is at CMS now and future costs? Bleachers for both home and visitors;
  - Clarify what is at CMS now and future cost? Press box;
  - Clarify what is at CMS now and future costs: Locker room/team rooms;
  - Clarify what is at CMS now and future costs: Restrooms for spectators and teams;
  - Didn't you already prove there is enough parking? Parking lot and associated lighting;
  - Clarify what is at CMS now and future costs: Space for sports medicine staff and athlete treatment;
  - Ticket booth and concessions area; and
  - This cost is same for both CHS & CMS? Why include in your list? Field lighting.

35

- PAGE 33: you state *If constructed in the location shown in the Carmel Unified School District Facilities Master Plan (2019 master plan), the lighted stadium would replace an area of the existing Carmel Middle School campus where four softball and baseball fields are currently located. If implemented in accordance with the 2019 facilities master plan, those softball and baseball fields would be relocated to an adjacent, undeveloped lot, which is owned by the school district, next to the middle school.* However, you don't provide the following critical information:
  - Who is currently playing (schedules and amount of students at the four softball and baseball fields?)
  - Why can't the students at the CMS softball and baseball fields play at CHS? Understanding their schedules, students will need to be critical inputs into the VMT which then impacts GHG, transportation, etc.
  - The evaluation of the baseball fields at CHS should be part of this RDEIR since you've expanded the scope to "athletic fields" and are including the swimming pool as part of the consideration set. It's an all or nothing view (not picking which areas suit your biased evaluation)

36

- Given there is potential for SIX athletic fields, why displace any existing teams or activities. Move the proposed stadium lights to the yet development fields?
- PAGE 33: you state: *While the potential stadium site is largely flat with existing playfields, Cypress trees line the site along the west and south boundaries. Potential tree removal may be required depending on the extent of construction and development activities.*
  - But isn't that the case also with your proposed new parking lot that rips out the tennis courts (overlying page 99 & 199). You don't even have plans – this is a mute point – please remove.

37

- PAGE 33: you admit that CMS is better for long term parking not only for "worst-case" but nicely would absorb the DAILY and HORRIFIC challenges CHS has in dangerous intersections, no sidewalk, no opportunity for better cross-walks, etc. You hide the overt fact in a long string of mixed ideas.
  - **LOSER:** CHS: approximately 341 (617 demand - 276 available) parking spaces
  - **WINNER:** CMS: additional 218 parking spaces would be needed (617 demand – 199 available – 200 overflow parking spaces).

38

- You've acknowledged the 130-unit residential neighborhood coming for Rancho Canada Village. In fact, you fed into their EIR. Please provide that transparency into this future potential of CMS. You did the due diligence of projecting students, etc. That roll-up should be captured in this impact of measuring transportation, student size, etc. The CEQA process does allow for "use of projected future conditions as additional baseline" and you submitted enough reliable projections based on substantial work that has been done to date.

39

- You have not disclosed all the inputs on page 358: Master Planning at Carmel Middle School:
  - You reference: *In 2011, the school district studied constructing a stadium complex at Carmel Middle School, but the space required to accommodate such a stadium was determined to be infeasible given space requirements. Please provide the study so we can validate your assumptions.*
  - Your reference: *The estimated cost in 2011 was \$24 million.* But you don't provide ANY budget breakdowns on any components. **Please provide what the cost included in that \$24 Million – need head-to-head evaluations, not overinflated scopes of work that are not equal.**



39  
con't.

- You state: *In addition, these improvements would cost upwards of \$72 million dollars, which is not currently funded and would require a bond measure to ensure proper financing.* Please provide the cost breakdowns of the \$72 Million estimate. In comparing alternatives, you should be narrowing down the same scope to apply to CMS as CHS. The \$72 Million quoted is a scare tactic with lots of “pork” that does allow for a fair evaluation of this alternative.

40

**PAGE 36: Alternative 4 Alternative Location (New, Lighted Stadium at Carmel Middle School) for Practices and Games: You state this alternative doesn't meet objectives but you don't provide enough information or misleading information on your reasoning: FALSE:** This alternative would not meet the following project objectives:

- *RDEIR: Statement: Doesn't "Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds*  
RESPONSE/COMMENT/QUESTION:
  - You don't provide any details on current on-campus traffic circulations, fire and emergency vehicle access, campus security and safety, etc? Can you provide details of current state? You've sharing “parking space” challenges but that is different than Traffic Circulation. Please provide historical analysis of traffic circulation from Keith Higgins when the Performing Art Center and Swimming Pool were developed. What were the plans recommended then, how did you adopt and what are they now at CHS? What is it we are trying to improve? Also, a new plan at CMS could easily meet an even BETTER outcome that is not achievable at CHS because it is limited and land-locked.
- *RDEIR: Statement: Doesn't "Improve and expand on-campus parking facilities to meet need at Carmel High School*  
RESPONSE/COMMENT/QUESTION:
  - We've provided you context on the math that the limited 22 acre campus will never be able to meet current and/or project school enrollment at CHS. If this your object, what is your target of total parking spaces? Why wasn't this achieved during the major investment of construction for the Performing Art Center, Science Wing, Swimming pool. How are you measuring this to do comparisons that CMS is not a viable solution?
- *RDEIR: Statement: Doesn't "Implement "green building" practices that foster energy conservation*  
RESPONSE/COMMENT/QUESTION:
  - This is a low-cost objective that should be done outside of the stadium lights and athletic improvements. This doesn't exclude CMS as a viable solution. You can isolate this objective, achieve it AND have CMS as a viable solution.
- *RDEIR: Statement: Doesn't replace outmoded athletic lighting fixtures with new fixtures that will obtain dark sky certification"*  
RESPONSE/COMMENT/QUESTION:
  - This is a low-cost objective that should be done outside of the stadium lights and athletic improvements. This doesn't exclude CMS as a viable solution. You can isolate this objective, achieve it AND have CMS as a viable solution.
- *RDEIR: Statement: Doesn't Enhance the spectator experience during sporting events by adding an alternative viewing location different from the existing bleachers;*  
RESPONSE/COMMENT/QUESTION:
  - It could, why not? Build it into the design. This feature doesn't exist on either campus. It shouldn't be a show stopper for this alternative.
- *RDEIR: Statement: Doesn't Augment the secure storage space available to the District's athletic programs;*  
RESPONSE/COMMENT/QUESTION:
  - Still unclear what exactly needs to be put into the secure storage space? What is the current state at Carmel High School? What need to improve and given CMS is a clean state, it would be easy to build this into the scope on either campus. Not a block to meeting this objective.

40  
con't.

- *RDEIR: Statement: Doesn't Reduce operational difficulties and complex coordination issues with respect to the scheduling of practices and games for District athletic programs*  
RESPONSE/COMMENT/QUESTION:
  - Can you clearly clarify what are the operational difficulties and complexities you are trying to fix?
- *RDEIR: Statement: Doesn't Achieve these objectives within the District's allocated budget allowances.*  
RESPONSE/COMMENT/QUESTION:
  - You provide absolutely no details on budget for any part of the project?

41

**CEQA requires Environmentally Superiority Alternatives. Have you considered this combination?**

- Why not fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below? Wouldn't it be easy to Implement Usage Policy that is legally and forever binding?
- Why not Implement "Green Building Lighting" on any existing fixtures on the campus?
  - Wouldn't it be easy to execute ASAP on all existing fixtures? The photo below not only shows the light pollution of the pool but the entire backside of the school is consistently lit. Why do you need back of building lights on? What is your schedule and criteria of when lights should be on and off?



- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures.
  - There is no way around it – this is bad for the environment and bad for the community.
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
  - Why haven't you provided any level of detail for decision makers? You can't approve?
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
  - Why haven't you provided any level of detail for decision makers? You can't approve.
- Isn't it easy to Assess what needs to be fixed with Tennis Courts and fix them for the Tennis Students? Environmentally isn't this the least damaging option to environment than replacing with parking lot?
- Fast track Late Start outside of the CEQA process. It's not a construction project and should not be part of RDEIR.
- Why not take the proper amount of time to assess the long-term viability of future growth at CMS? No short-term fixes at CHS. What is your schedule to revisit the Facilities Master plan? Shouldn't that be reviewed every 3 years?

Mr. & Mrs. Dillard

Carmel

# Revised Draft Environmental Impact Report for CHS Stadium Lights

Official Feedback Submission Sent Prior to the Deadline of October 10<sup>th</sup> at 5 PM



**QUESTIONS/COMMENTS:**

- Transportation states "Impact 11-4. An Increase in Event Attendance Could Result in Inadequate Parking During Limited Nighttime Events with Potential Emergency Access Issues"
- **Why doesn't the RDEIR include, address or highlight the current Transportation/Parking/Traffic Circulation problem of chronic traffic, congestion, circulation and parking problem as part of the Environmental Setting at Carmel High School?**
- Transportation: Parking Capacity and Emergency Access will always remain a "Significant" Environmental Impact without viable mitigation measures because CHS is a land-locked 22-acre campus with limited growth:
  - Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
  - Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
  - Even current bleachers are problematic: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they want to attempt to absorb more than 2,000 attendees
  - Baseball Field with gated entry off Morse Drive is narrow and experiences fire lane violations on a regular basis.
- Don't you agree that the Carmel High School Campus traffic circulation and congestion is problematic on a daily basis? The has been a consistent discussion with CUSD and CHS that traffic congestion significantly increases during any on-campus activity, not just athletic sports. Why not acknowledge that challenge as the baseline?
- Issues are so significant on campus they overspill to Scenic Highway 1 and residential streets (North Carmel Hills, Morse, Flanders, etc).
- Each of the three areas are significantly impacted daily:
  1. On Campus
  2. Scenic Highway 1
  3. Residential Streets surrounding the High School including North Carmel Hills, Morse and Flanders with pressure on ALL streets outlined in Appendix B and streets on the east side of Scenic Highway 1.

- **What do you believe is the root cause of this traffic circulation problem? We are tracing it to the below:**
  - CUSD completed the Performing Art Center, new science wing and swimming pool in 2007.
  - The community was not informed there would be no CEQA process, no signed or filed Notice of Exemption and no DSA 810 Fire and Safety Forms submitted for Emergency Access Routes.
  - Instead, a School Board Resolution was quietly passed:
  - CUSD did not properly plan allocation for appropriate number of parking spaces and/or traffic circulation.
  - The reality is the land-locked 22-acre campus that doesn't have enough land for appropriate build out.
- Is there a standard and/or guidelines you followed in planning the campus? If you only have 22-acres, what should the ratio be with buildings, parking and open space? How does that compare to number of students/staff on campus? What is the baseline and how does that change with your posed projects?
- The following issues are consistently identified from the community:
  - Significant Vehicle Queues (internally and on public roadways)
  - Illegal Turning Movements
  - Improper Lane Usage
  - Use of Improper Drop-Off and Pick-Up Areas
  - Bus vs. Parent Vehicle Ratio
  - Bus vs. Parent Vehicle Segregation

We **DEMAND** A Vehicular Access and Circulation Study (On Campus and surrounding Scenic Highway 1, residential streets including all identified in Appendix B (plus west side) within 5 mile radius needs to be conducted. CUSD must grant permission for on-site campus access to accomplish this.

Potential programmatic enhancements might be identified:

- Bus Schedule/Ride Time Evaluation
- Student Dismissal - Buses vs. Other Vehicles
- Additional Staff in the drop-off/pick-up areas
- Student Dismissal Times (e.g. Conestoga High School and T/E Middle School).
- Additional Crossing Guards
- Municipal Enforcement of Existing Parking Restrictions

**While some ticketing occurs, the violations on a consistent basis is very overwhelming for a short-staffed law enforcement. It's abuse of tax-payer dollars given the problem was created by CUSD.**

*California Vehicle Code 22504 – (a) Upon any highway in unincorporated areas, a person shall not ...*

*(a) Upon any highway in unincorporated areas, a person shall not stop, park, or leave standing any vehicle, whether attended or unattended, upon the roadway when it is practicable to stop, park, or leave the vehicle off such portion of the highway, but in every event an unobstructed width of the highway opposite a standing vehicle shall be left for the free passage of other vehicles and a clear view of the stopped vehicle shall be available from a distance of 200 feet in each direction upon the highway. This section shall not apply upon a highway where the roadway is bounded by adjacent curbs*

**How can you include good community engagement such as an online community survey with the following types of questions below? Why can't ALL THIS SHOULD be COMPLETED BEFORE A FINAL EIR is approved given the results may significantly impact new parking lot designs and locations? Why aren't you required to do this?**

- Adequacy of Parking Lots
- Driveway Access
- Arrival/Dismissal Times
- Bus Traffic
- Non-Bus Traffic
- Pedestrians
- Crossing Guards
- Traffic Control and Enforcement

**More questions and comments:**

- 46
- Why are you not providing clear and transparent Emergency Access Routes for all campus activities (current campus activities plus potential impacts from all proposed new athletic practices/meets/games - football, soccer or anyone using the stadium with lights)?
- 47
- Why are you not developing pro-active Community Engagement within 5-mile radius of campus (includes east and west side of Highway 1) and the Monterey County Department of Public Works, Facilities and Parks for a long-term viable Traffic Assessment Plan to include long-term "Resident Parking Only Signage"?
- 48
- Why haven't you establishing a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel?
- 49
- Why haven't you EXECUTE EVERYTHING ON Page 18 of Appendix K: Traffic Management Plan? You recommend, so why haven't you done to-date? This should have been baseline before the approval of RDEIR.
    - *CHS, as a neighbor that generates traffic using these streets, will not increase traffic loads through the implementation of this TMP. However, the school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
      - *Updating required school area warning signage*
      - *Consider posted speed reductions down to 15 MPH in school areas*
      - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include speed humps*
      - *Exploring additional stop sign controls at intersection*
- 50
- What considerations are needed to Conduct a Vehicular Access and Circulation Study? Will CUSD conduct one? Why or Why Not?
- 51
- When do you plan on updating the Facilities Master Plan? It's done about every three years with last one done in 2019. Define long-range goals for facility planning given CHS is geographically land-locked within a 22-acre campus with no viable solutions for daily parking whereas Carmel Middle School has 60-acres permitting safe and responsible growth.



Resolution 08-08 in February 2008 dismisses that a CEQA or signed/filled Notice of Exemption was needed for SIGNIFICANT construction on campus to include Performing Art Theater, Science Wing and Swimming Pool with referenced RDEIR Lights. In addition, when construction plans were submitted to DSA for approval, they were in sections (not as a whole) so that a 810 Fire and Life Safety Form was not filled out. CUSD did not conduct a Vehicular Circulation Study or appropriately plan for the number of required parking spaces. This is a 22-acre land-locked campus that has no more room to grow.

**BEFORE THE BOARD OF TRUSTEES  
OF THE CARMEL UNIFIED SCHOOL DISTRICT  
MONTEREY COUNTY, CALIFORNIA  
RESOLUTION NO. 08-08**

**RESOLUTION RENDERING LOCAL ZONING ORDINANCE  
INAPPLICABLE TO PROJECTS AT CARMEL HIGH SCHOOL AND DETERMINING  
PROJECTS ARE EXEMPT FROM  
THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**

WHEREAS, Carmel Unified School District ("District") is conducting a modernization program at Carmel High School, which program consists of the projects described on Exhibit A hereto ("Projects"); and

WHEREAS, the Projects are located on a District-owned site, the campus of Carmel High School, located on the west side of Highway 1 at Ocean Avenue ("Site") in the unincorporated area of Monterey County; and

WHEREAS, the District is empowered by Government Code section 53094 to render city or county zoning ordinances inapplicable to its proposed use of property for school district purposes except when the proposed use is for nonclassroom facilities; and

WHEREAS, each of the Projects is intended for instructional purposes, in that the Projects consist of the construction of instructional facilities ranging from new classrooms to a new library and theatre building, as well as the replacement of an aging sign with a new electronic sign that will provide regularly updated information on enrollment, classes and activities to District students and the community, and therefore the Projects are not a "nonclassroom" facility as defined by Government Code section 53094 and relevant case law; and

WHEREAS, the District is subject to numerous State requirements and State oversight regarding construction on District school sites, which are designed to ensure that school construction and reconstruction projects are safe and promote the public interest, and the District has obtained or is in the process of obtaining State approval for each of the Projects where required by applicable law; and

WHEREAS, the Projects will not have a significant effect on the environment and are categorically exempt from the provisions of the California Environmental Quality Act ("CEQA") as set forth in CEQA Guidelines § 15301 (minor alterations to existing facilities), 15302 (replacement or reconstruction of existing structures and facilities), 15311 (construction or placement of structures accessory to or appurtenant to, existing institutional facilities) and 15314 (minor additions to schools).

NOW, THEREFORE, THE BOARD OF TRUSTEES OF CARMEL UNIFIED SCHOOL DISTRICT FINDS, DETERMINES, AND RESOLVES AS FOLLOWS:

1. The foregoing recitals are true and correct.

2. By this Resolution, the District renders zoning ordinances of the County of Monterey inapplicable to the Site and its proposed uses by the District for the Projects.
3. The Superintendent, or his designee, is directed to notify the County of Monterey of this action by delivering a copy of this Resolution to the County Planning Department.
4. The Board finds that the Projects will not have a significant effect on the environment.
5. The Projects are hereby found to be exempt from the requirements of CEQA pursuant to State CEQA Guidelines sections 15301, 15302, 15311, and 15314, as set forth above, and are hereby approved.
6. The Superintendent or his designee is hereby authorized and directed to file and process a Notice of CEQA Exemption for the Project in accordance with CEQA and the State CEQA Guidelines, and the findings set forth in this Resolution, which Notice is attached hereto as Exhibit B.
7. The Superintendent or his designee is authorized and directed to take such further actions as may be necessary and appropriate to carry out the intent of this Resolution.
8. This Resolution shall take effect immediately upon its adoption.

\*\*\*\*\*

PASSED AND ADOPTED by the Board of Trustees of the Carmel Unified School District at its meeting held on February 11, 2008, as follows:

AYES: 4  
NOES: 1  
ABSENT: 0  
ABSTAINED: 0

Attest:

  
Secretary, Board of Trustees  
Carmel Unified School District

  
President, Board of Trustees  
Carmel Unified School District

Resolution 08-08 in February 2008 dismisses that a CEQA or signed/filed Notice of Exemption was needed for SIGNIFICANT construction on campus to include Performing Art Theater, Science Wing and Swimming Pool with referenced RDEIR Lights. In addition, when construction plans were submitted to DSA for approval, they were in sections (not as a whole) so that a 810 Fire and Life Safety Form was not filled out. CUSD did not conduct a Vehicular Circulation Study or appropriately plan for the number of required parking spaces. This is a 22-acre land-locked campus that has no more room to grow.

52  
cont.

Exhibit A—List of Projects at Carmel High School

New Library Building:	Construction of new library building, including demolition of existing drama room to provide site for library building
New Theatre Building:	Construction of new theatre building, including demolition of old library building to provide site for theatre building, and renovation of adjacent classroom wing, including structural upgrades to three classrooms
2 Science Classrooms:	Reconstruction and modernization of two science classrooms
Cafeteria:	Demolition and reconstruction of cafeteria canopy and modernization of cafeteria interior
New Classroom Wing:	Construction of new wing consisting of four classrooms
Relocation of Classrooms:	Relocate portable classrooms to make way for theatre project and also to make space for new pool
Electronic Sign:	Replace existing sign with electronic sign
New Pool:	Installation of swimming pool and construction of attendant facilities, including installation of lighting system
Classroom 24:	Reconstruction of aging classroom structure
Gym Expansion:	Expansion and reconstruction of gymnasium
Replacement of Student Lockers	

3

**Exhibit B - Notice of Exemption**

**To:** Monterey County Clerk  
Monterey County Government Center Administration Building  
168 W Alisal St., 1st Floor  
Salinas, CA 93901

**From:** Carmel Unified School District  
PO Box 22776  
Carmel, CA 93922

**Project Title:** Modernization and new construction at Carmel High School Project  
**Project Location - Specific:** 3500 Ocean Ave., Carmel, CA 93923.  
**Project Location - City:** n/a **Project Location - County:** Monterey

**Description of Nature, Purpose, and Beneficiaries of Project:** Construction of new library, theatre and classroom buildings and swimming pool; reconstruction and modernization of existing classrooms, cafeteria and gymnasium; relocation of portable classrooms; and replacement of existing sign and existing student lockers, all within the existing campus.

**Name of Public Agency Approving Project:** Carmel Unified School District  
**Name of Person or Agency Carrying Out Project:** Carmel Unified School District

**Exempt Status: (check one)**

- Ministerial (Sec. 21080(b)(1); 15268;
- Declared Emergency (Sec. 21080(c)(3); 15269(a));
- Emergency Project (Sec. 21080(d); 15269(b)(c));
- Categorical Exemption. State type and section number: **Classes 1, 2, 11, and 14, Sections 15301, 15302, 15311, and 15314**
- Statutory Exemptions. State code number:

**Reasons why project is exempt:** This Project replaces and reconstructs existing structures and facilities, provides minor alterations to existing facilities, provides construction or placement of structures accessory to or appurtenant to existing institutional facilities, and minor additions to the existing High School campus. The location is within the existing High School campus and a portion of the project involves negligible or no expansion of the existing uses. The new replacement facilities have substantially the same purpose and capacity as the old facilities they replace. The District has determined that the Project will not have a significant impact on the environment. The Project will not impact on an environmental resource of hazardous or critical concern within the meaning of Guidelines section 15300.2(a), or otherwise come within any of the exceptions set forth in Section 15300.

**Lead Agency**  
**Contact Person:** Rick Blanckmeister **Telephone/Extension:** (831) 624-1456, ext. 2050  
**If filed by applicant:**

- Attach certified document of exemption finding
- Has Notice of Exemption been filed by the public agency approving the project?  Yes  No

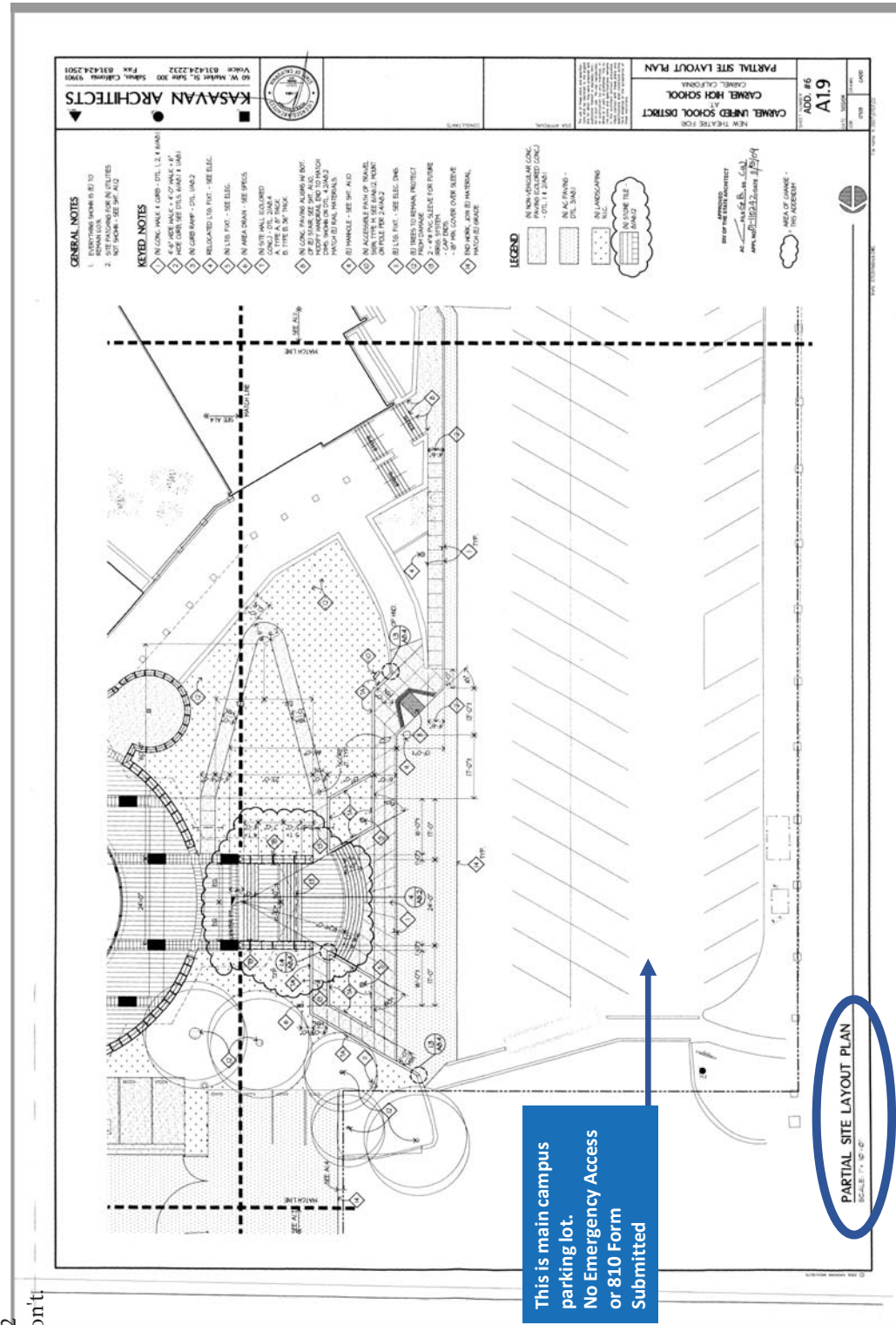
Signature: \_\_\_\_\_ Date: \_\_\_\_\_, 2008  
Title: \_\_\_\_\_ Carmel Unified School District

4

**No Signature  
No Filed Date**

On-Camps Traffic Circulation a problem since the construction of Performing Art Theater, Science Wing and Swimming Pool/lightes (referenced in RDEIR). CUSD only submitted "partial site layout plans" when construction plans were submitted to DSA for approval, they were in sections (not as a whole) so that a 810 Fire and Life Safety Form was not filled out. CUSD did not conduct a Vehicular Circulation Study or appropriately plan for traffic flow OR the appropriate number of required parking spaces. This is a 22-acre land-locked campus that has no more room to grow.

52  
cont.



This is main campus parking lot. No Emergency Access or 810 Form Submitted

PARTIAL SITE LAYOUT PLAN  
SCALE: 1/4" = 1'-0"

- DSA Stamped Approved for Theater\_110242.pdf
- DSA Stamped for Bleachers\_113674\_files.pdf
- DSA Stamped for Pools\_107553\_files.pdf
- Press Box and Donor Wall\_114575\_files.pdf

NONE of the DSA Construction Plans submitted a 810 Fire and Life Safety Form



On-Campus traffic circulations, congestions and lack of safe traffic flow impede Emergency Access Routes.



Back-ups on Highway 1 Entrance consistently cause "Stopping & Standing" in Fire Zones



Main Campus: Red Zone No Parking consistently has parked vehicles



Main Campus: Cars are consistently "parked" in the drop-off lanes.

## On-Campus traffic circulations, congestions and lack of safe traffic flow impede Emergency Access Routes.

Back Entrance of Main Campus Back-up. This bus parked in front of NO Parking Sign Behind them

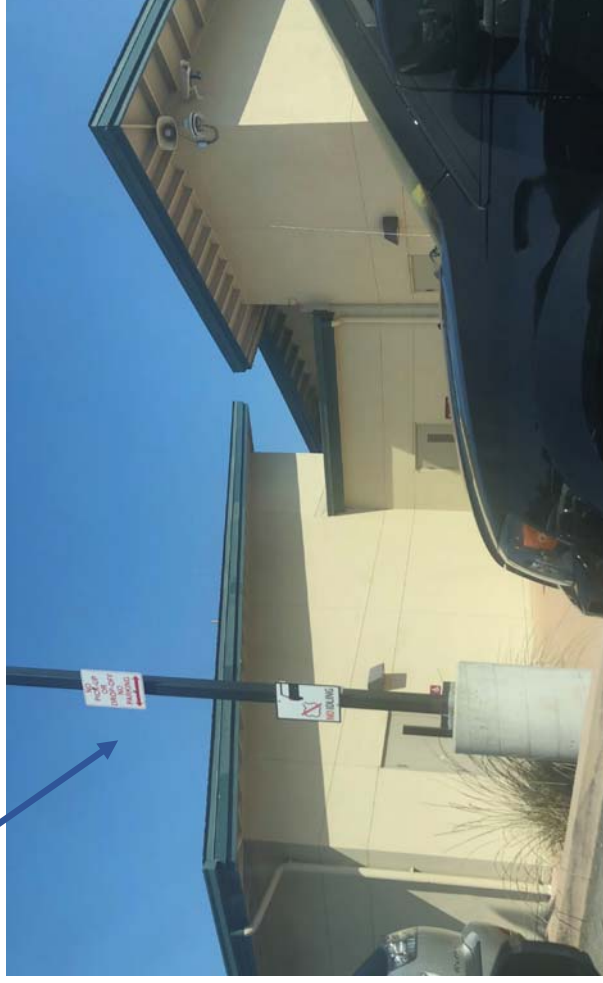


Main Campus: This is the back entrance that is used daily and is backed-up daily on to Scenic Highway (photo of the back-up traffic in a cue is on Slide 13. What is happening on the campus itself is poor traffic circulation with "bus" stop marked in orange cones (First Come Says "Do No Block Buses). Second cone says "No Stopping" but the bus blocks the entrance and cars from Highway 1 attempting to turn in with right turn wait on Highway 1.



On-Campus traffic circulations, congestions and lack of safe traffic flow impede Emergency Access Routes.

Main Campus: Cars are consistently "parked" in the drop-off lanes.



Main Campus: Doesn't provide enough pedestrian walkways. People walk in the road and safety is further at risk when the car are illegally parked in the No Parking Lane as shown above in both photos. There seems to be a lack of upholding legal parking on campus.



## On-Campus traffic circulations, congestions and lack of safe traffic flow impede Emergency Access Routes.



Main Campus: Cars are consistently "parked" in the drop-off lanes.



Main Campus: Doesn't provide enough pedestrian walkways. People walk in the road and safety is further at risk when the car are illegally parked in the No Parking Lane as shown above in both photos. There seems to be a lack of upholding legal parking on campus.



## On-Campus traffic circulations, congestions and lack of safe traffic flow impede Emergency Access Routes.

Main Campus: Cars are consistently "parked" in the drop-off lanes.



Poor Traffic Circulation on Campus is a tight on-way limiting flow. Design of parking lot doesn't allow for safe passing and/or limited double parking. Violations on a daily basis.

School Bus Waiting on North Carmel Hills (residential street, parked illegally)



No Safe Pedestrian Walkways: Intersection of CHS Entrance and Exit on Scenic Highway 1.



Poor Traffic Circulation on Main Campus. Poor Pedestrian Walkways. Poor transitions onto exits and entry ways on to Scenic Highway 1.

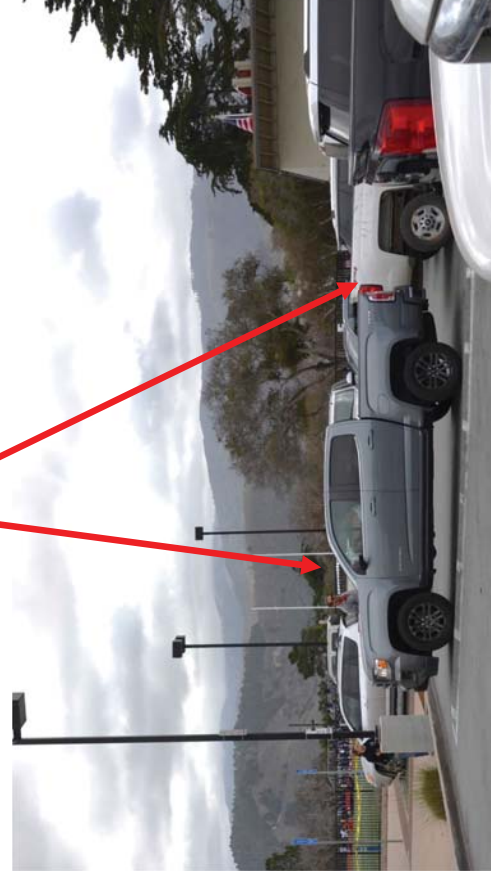


On-Campus traffic circulations, congestions and lack of safe traffic flow impede Emergency Access Routes.



**Emergency Access Routes**  
Requested several times with no response.  
The stadium area doesn't look like it has enough access for emergency vehicles.  
Main entrance is consistently blocked  
With Fire signs everywhere.  
Is this legal?

On-Campus traffic circulations, congestions and lack of safe traffic flow impede Emergency Access Routes.  
Are current parking spaces large enough for exits?



Please provide current main campus parking lot specs and design of traffic flow.  
Consistent challenges of cars trying to pull out, backed up traffic and lack of supervision.

## MORSE DRIVE: Residential Streets Consistently Overflowed (Intersection of Highway 1/Tennis Courts/Baseball Field)

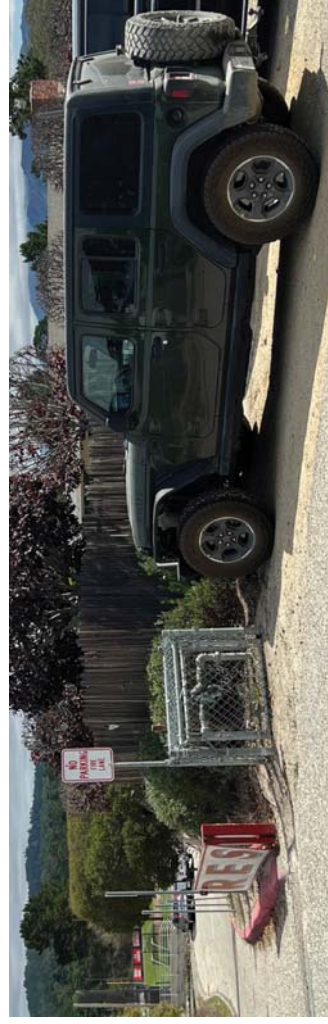
- It took neighborhood several years to have County install M-F, No Parking 8 – AM – Noon.
- However, we've had no luck getting No Parking Residents Only for full protection that is needed including weekends from CHS activities.
- RDEIR reference sites are the tennis courts (parking impeding CALTrans Right of way, baseball fields and gate entry way.)
- Given CHS is the root cause, we've asked CUSD to partner with us for County Solution. No Response or Action.



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- It took neighborhood several years to have County install M-F, No Parking 8 – AM – Noon.
- However, we've had no luck getting No Parking Residents Only for full protection that is needed including weekends from CHS activities.
- RDEIR reference sites are the tennis courts (parking impeding CALTrans Right of way, baseball fields and gate entry way.)
- Some ticketing occurs under

Law Enforcement is Overwhelmed and Short Staff to consistently address this parking overflow that is caused by CUSD activities (both athletic and otherwise).





## MORSE DRIVE: Residential Streets Consistently Overflowed (Intersection of Highway 1/Tennis Courts/Baseball Field)

- It took neighborhood several years to have County install M-F, No Parking 8 – AM – Noon.
- However, we've had no luck getting No Parking Residents Only for full protection that is needed including weekends from CHS activities.
- RDEIR reference sites are the tennis courts (parking impeding CALTrans Right of way, baseball fields and gate entry way.)
- Given CHS is the root cause, we've asked CUSD to partner with us for County Solution. No Response or Action.



Fire Lane Violations + Narrow Lane + Two Cars and this is the edge of residential street (Morse & Highway 1)!

Following slides will show the Emergency Access Route is constantly being violated in this narrow lane that intersects Morse, Scenic Highway 1, and tennis/baseball field





## MORSE DRIVE: Residential Streets Consistently Overflowed (Intersection of Highway 1/Tennis Courts/Baseball Field)

- It took neighborhood several years to have County install M-F, No Parking 8 – AM – Noon.
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- RDEIR reference sites are the tennis courts (parking impeding CALTrans Right of way, baseball fields and gate entry way.)
- Given CHS is the root cause, we've asked CUSD to partner with us for County Solution. No Response or Action.



Constant Fire Lane Violation on this narrow gate access connecting baseball field, tennis courts and Morse, Scenic Highway 1. RDEIR doesn't accurate capture baseline (do you have Fire Emergency Access Routes) and how will new concepts change this?

## MORSE DRIVE: Residential Streets Consistently Overflowed (Intersection of Highway 1/Tennis Courts/Baseball Field)

- It took neighborhood several years to have County install M-F, No Parking 8 – AM – Noon.
- However, we've had no luck getting No Parking Residents Only for full protection that is needed including weekends from CHS activities.
- RDEIR reference sites are the tennis courts (parking impeding CALTrans Right of way, baseball fields and gate entry way.)
- Given CHS is the root cause, we've asked CUSD to partner with us for County Solution. No Response or Action.



Fire Lane Violation down the path of baseball Lane.



Fire Lane Violation down the path of baseball Lane.  
Open Car Door with entry / exit of Passenger



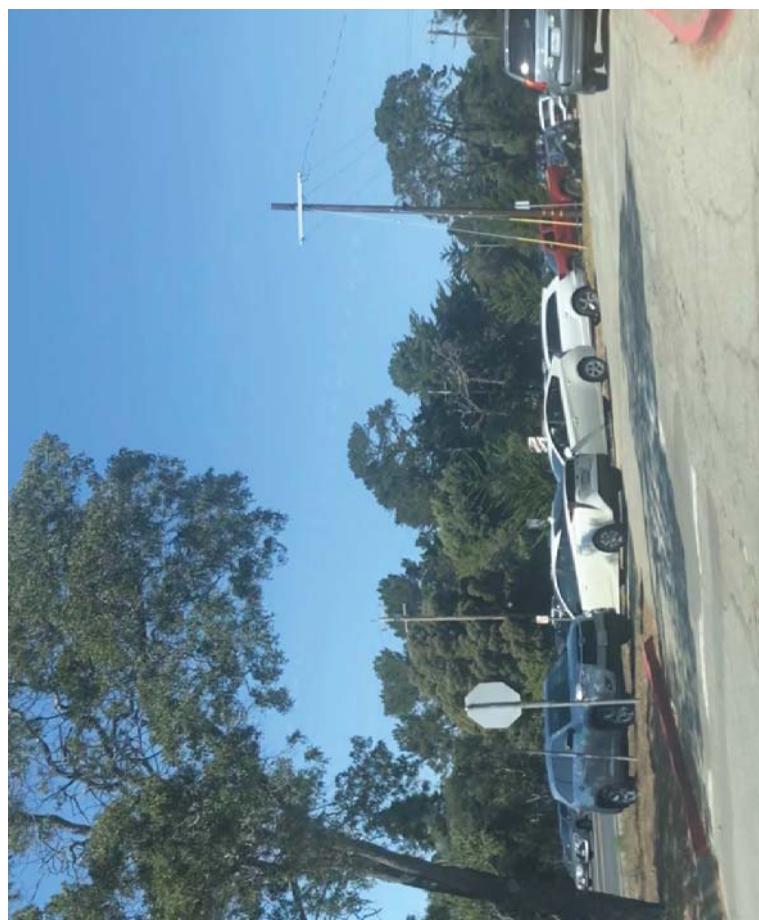
Fire Lane Violation down the path of baseball Lane. Passing Cars in Narrow Lane





## Scenic Highway 1 and North Carmel Hills with Entrance to Carmel High School

- Completely unsafe. No monitoring. No Traffic Management Plan. Not enough safe pedestrian walkways. No guards. All Chaos constantly.



Layers and layers of parked cars in undesignated parking!



Scenic Highway 1 provides limited "Pedestrian Crossways". Cars are constantly double parked right in front of Carmel High School. Traffic Circulation is limited because of entry way and residential streets.



## Scenic Highway 1 and North Carmel Hills with Entrance to Carmel High School

- Completely unsafe. No monitoring. No Traffic Management Plan. Not enough safe pedestrian walkways. No guards. All Chaos constantly.



Layers and layers of parked cars in undesignated parking!



Layers and layers of parked cars in undesignated parking!



Older Gentleman walking with a cane - no pedestrian walkways!



Layers and layers of parked cars in undesignated parking!

## Scenic Highway 1 and North Carmel Hills with Entrance to Carmel High School

55

cont.

- Completely unsafe. No monitoring. No Traffic Management Plan. Not enough safe pedestrian walkways. No guards. All Chaos constantly.

This series of photos represents the daily traffic congestion that is occurring on Scenic Highway 1 as a result of POOR planning on circulation traffic on the main campus of CHS. This is NOT about lack of parking spaces but the fact the land-locked 22-acre campus is bursting at the seams and there has been no proper long-term planning in growth. This is not reflected in the Environmental Setting of the RDEIR. Introducing or encouraging any nighttime activities is irresponsible to the community and introduces further Emergency Access blockage.



The back-up to CHS back entrance is atrocious on a daily basis during school drop-off and pick-up. TMP plans in the RDEIR address short-term minimum games versus CHS's inability to manage the daily traffic and emergency safety risks.

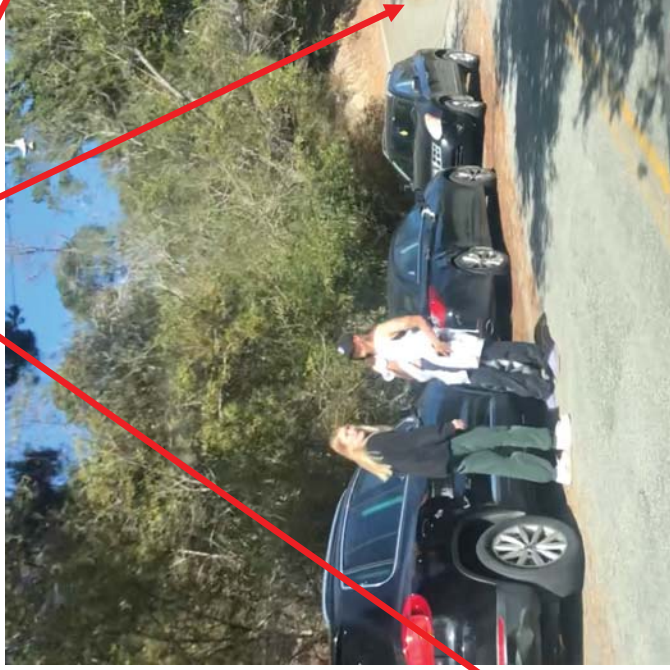


## Flanders: Back-side of Carmel High School

- While illegal parking has been alleviated on the back-side of Carmel High School with the closing of the back gate, this is a short-term fix and not legally binding or authoritative.
- In addition, all of the residential homes in Appendix B and those not identified on the east side of Highway 1 within 5 miles radius will be vulnerable to overspill at night in narrow unlight residential neighborhoods with no safe walkways.

55  
cont.

This is right across from an Elderly Care Facility: Agape on Flanders Drive

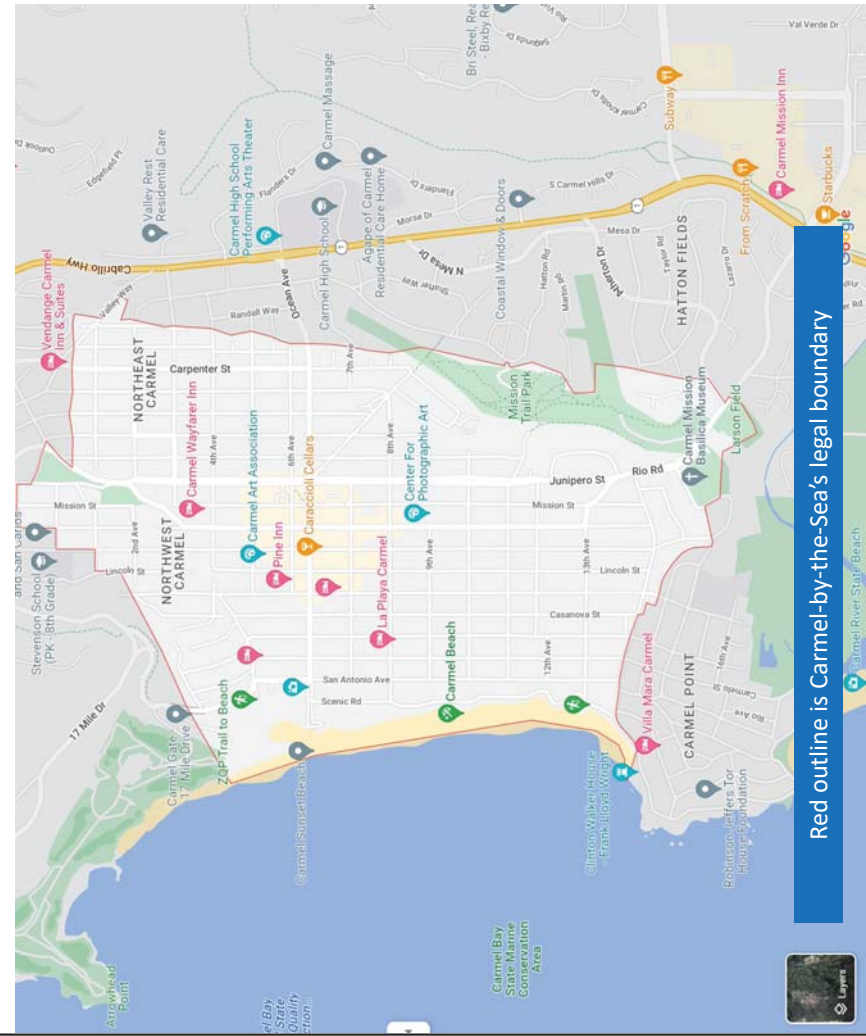


# Additional Questions outside of Transportation

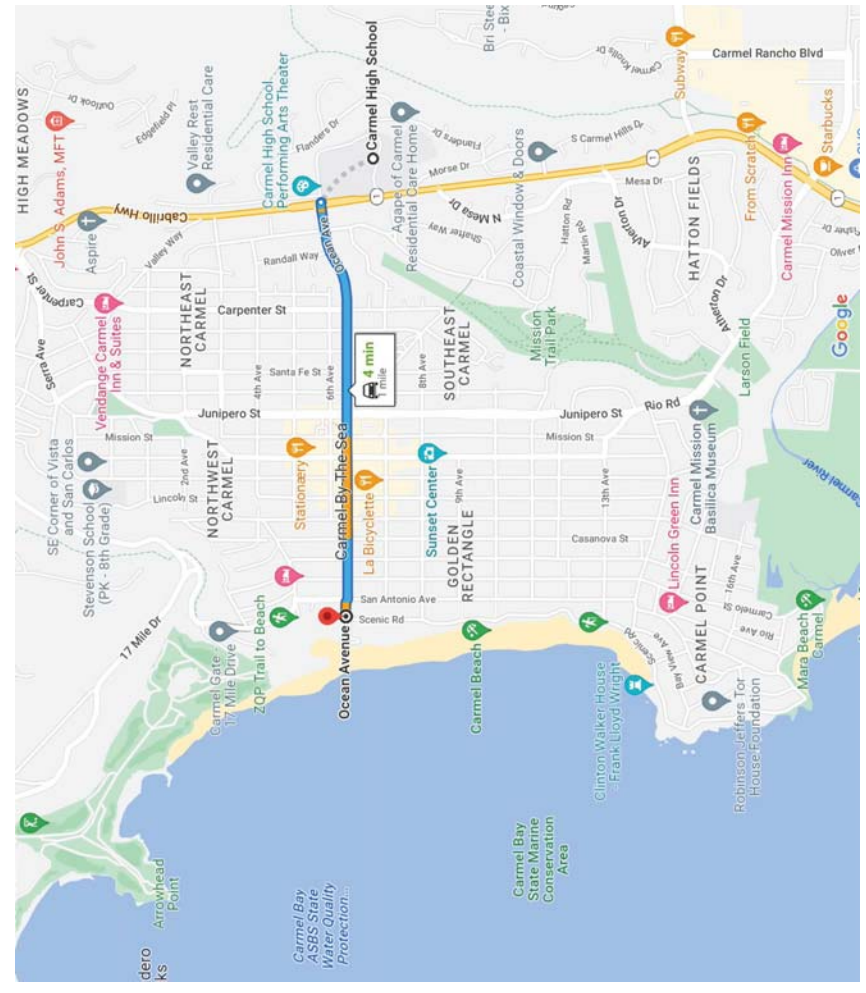
Appendix B: "Using the City of Carmel by the Sea's requirement for standard parking size dimensions"...

Also in RDEIR, you indicate: Mitigation Measure 11-4: 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

REQUEST/COMMENT/FEEDBACK: You MUST assess the parking and environmental conditions within the 1 mile you are suggesting alternative and recommendations for...all of Carmel-by-the-Sea must be park of the environmental setting AND all streets in the second MAP must also be included in the APPENDIX B: Parking Assessment.



Red outline is Carmel-by-the-Sea's legal boundary



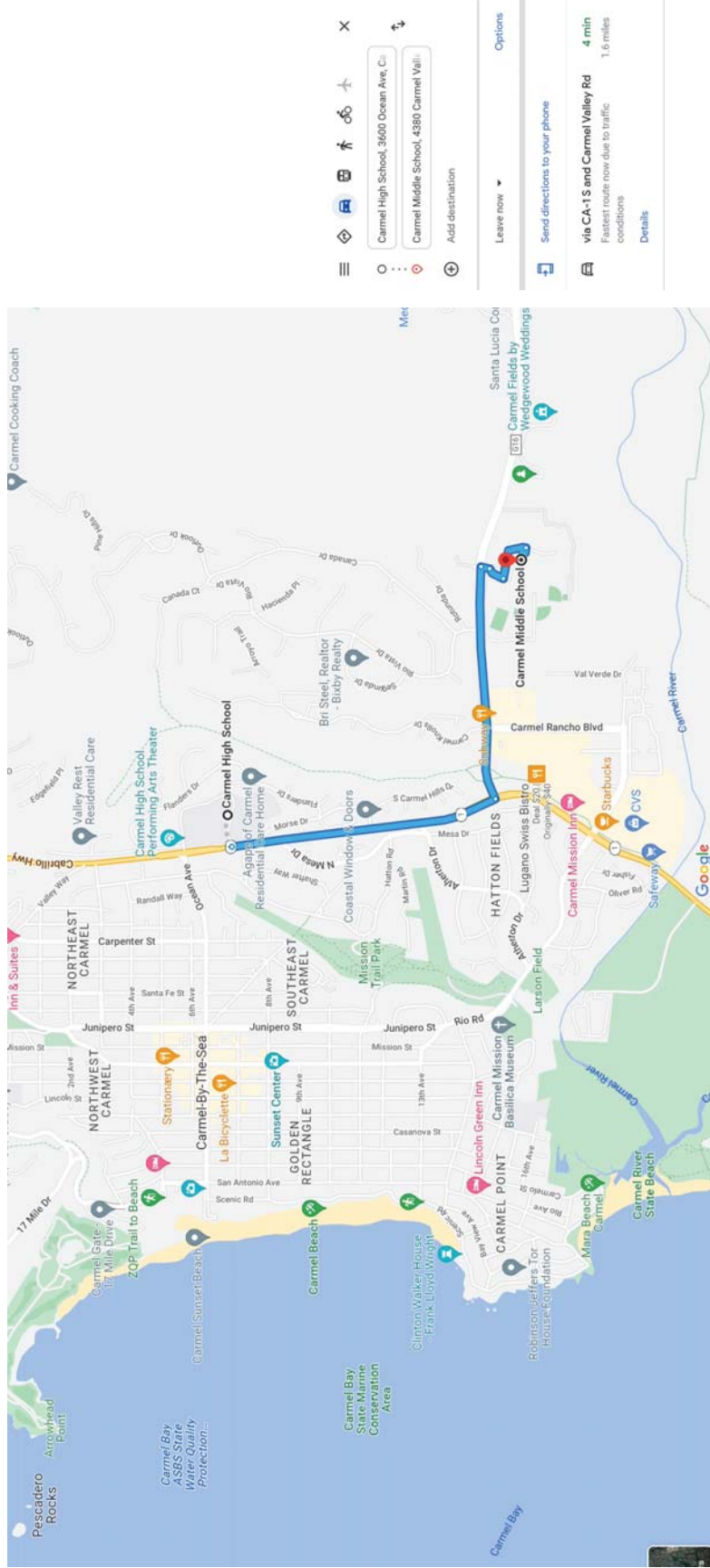


*Carmel Middle School is 1.6 miles from Carmel High School and yet less away from residential and protected marks.*

**REQUEST/COMMENT/FEEDBACK:**

**Why have you NOT provided enough information for Alternative 4 to make a proper assessment?**

**Areas of energy, GHG, VMT should be apples to apples – can you correct?. The distance is very close to each other, so you are overexaggerating the areas**



*Carmel Middle School is 1.6 miles from Carmel High School and yet less away from residential and protected marks.*

**REQUEST/COMMENT/FEEDBACK:**

**You have NOT provided enough information for Alternative 4 to make a proper assessment.**

**You said CMS as alternative would not meet the following project objectives:**

- Improve on-campus traffic circulation, fire and emergency vehicle access, campus security and safety, ADA access, and student, staff, and visitor access within the Carmel High School campus grounds;

**Can you provide the current on-campus traffic circulation, the fire and emergency vehicle access routes (current and how they will be improved).**

- Improve and expand on-campus parking facilities to meet need at Carmel High School;

**What are the "final" campus needs for parking at Carmel High School? What standards are you trying to achieve? Why wasn't parking spaces a requirement during all the new construction of the Performing Art Center, Science Wing and Pool? Where are the 810 Fire and Life Safety forms?**

- Implement "green building" practices that foster energy conservation, and replace outmoded athletic lighting fixtures with new fixtures that will obtain dark sky certification;

**Why can't you PURSUE " GREEN BUILDING PRACTICES (Environmentally more sustainable) AND assess CMS? There are not mutually exclusive. Come up with better Alternative: CMS (BETTER PARKING, ROOM FOR GROWTH AND IMPLEMENT GREEN BUILDING). Not tough, seriously.**

- Reduce operational difficulties and complex coordination issues with respect to the scheduling of practices and games for District athletic programs; and

**Can you PROVIDE CURRENT BELL SCHEDULES and then compare the BELL SCHEDULES to Monterey Peninsula High School?**

- Achieve these objectives within the District's allocated budget allowances.  
**NO COSTS ARE PROVIDED ANYWHERE? Can we have a spreadsheet with breakdowns if this is one of the objectives? How do you know you are achieving this breakdown without showing details?**

## Response to Letter 174, Mr. and Mrs. Dillard

1. This Letter provides a compilation of comments provided in other comment letters/emails, whose comments have been addressed in previous responses, mostly in Letters 14-1-a through 14-7-1 (total of 157 emails from one person), and Letters 10a through 10g. A reasoned and thorough response to this Letter has been made in good faith, however it should be noted that a response to this Letter is cumulative to other responses, and should be read together with the RDEIR and administrative record as a whole. This letter does not raise any new environmental issues that have not already been raise and addressed in previous letters and responses.

This comment is regarding the objective to improve on-campus traffic circulation access, and safety. Section 11.0, Transportation and Parking, as well as Appendix J, VMT Assessment and Intersection Operations, Site Access and Parking Evaluation for the proposed project, evaluates these issues. Regarding emergency access, see also response to Letter 14-2-f.

As a part of the RDEIR, Hexagon Transportation Consultants was engaged to conduct this study. They concluded that with the addition of 111 new parking spaces and implementation of the Traffic Management Plan including temporary traffic control measures, access, circulation, and parking would be acceptable. Moreover, changes to access, circulation, and new parking areas have been designed for improved safety. Please see further discussion under Impact 11-2 of the RDEIR. The school district further engaged TJKM transportation consultants to prepare a preliminary Traffic Management Plan to further study and implement Hexagon's recommendations. Therefore, the school district has conducted an appropriate study to evaluate these issues. Please see Appendix K of the RDEIR. No further analysis is required and no change to the RDEIR are necessary.

Regarding updating the 2019 Facilities Master Plan, this comment does not raise an environmental issue and therefore, no response is necessary.

Regarding public input and the CEQA process, please see Section 1.0 of the RDEIR, and refer to response to Letter 11b, comment 16, response to Letter 14-1-u, comment 1, and response to Letter 14-3-m, comment 1.

Baseline conditions are addressed in Section 3.0, Environmental Setting.

Alleged past actions taken by the City of Carmel-by-the-Sea regarding Styrofoam, EV charging stations, fast food, street lights, beaches, and other issues alleged in the comment are outside the scope of the RDEIR. Please note that the project site is located outside the boundaries of the City of Carmel-by-the-Sea. Please see Section 3.0, Environmental Setting.



District staff positions and resumes are outside the scope of the RDEIR and the CEQA process.

No further response is necessary.

2. Comment noted. The commenter expresses concern that new components, beyond the proposed stadium lighting, has been added to the project description, as well as new objectives. The RDEIR is different than the original DEIR. The original DEIR was revised (RDEIR) to address public comment on the original DEIR. As explained in Section 1.2, Summary of Revisions Made to the Previously-Circulated Draft EIR), this is the appropriate process when the lead agency (school district) modifies the project to respond to public concerns (pages 1-1 through 1-3. The environmental analysis in the RDEIR evaluates all of the project components. This comment asks detailed questions about the project objectives, but no environmental issues are raised. Please also see Section 1.0 of the RDEIR, and refer to response to Letter 11b, comment 16. No changes to the RDEIR are necessary.
3. Comment noted. The commenter expresses concern that new components, beyond the proposed stadium lighting, has been added to the project description. The RDEIR is different than the original DEIR. The original DEIR was revised (RDEIR) to address public comment on the original DEIR. As explained in Section 1.2, Summary of Revisions Made to the Previously-Circulated Draft EIR), this is the appropriate process when the lead agency (school district) modifies the project to respond to public concerns (pages 1-1 through 1-3). Please also see response to comment 2, above. The environmental analysis in the RDEIR evaluates all of the project components. This comment asks detailed questions about the project components, which are included at the detail necessary in the RDEIR to evaluate their environmental impacts, but no environmental issues are raised. Regarding emergency access routes, ingress and egress, as well as internal circulation, for everyday or for emergencies is presented in Figure 4-1, Overall Site Plan. Please also see response to Letter 14-1-g, comment 7, and Letter 14-2-f. For details of the proposed project, please refer to Section 4.0, Project Description, of the RDEIR. With respect to the viewing platform, please see responses to Letter 14-2-k, and Letter 14-4-n. Regarding visual impacts and State Route 1, please see Section 5.0, Aesthetics, of the RDEIR, and response to Letter 14-2-j. The baseball field and facilities are not included in the project description and are outside the scope of the RDEIR. Please see response to Letter 14-1-g, comment 4. Regarding the new internal roadway, please see discussion in Section 4.0, Project Description and Section 11.0, Transportation and Parking, of the RDEIR, and response to Letter 14-3-e. No changes to the RDEIR are necessary.
4. Regarding notification of previous commenter, everyone who commented on the original DEIR received a notice of availability of the RDEIR. In addition, the school district

continued to communicate with the community during preparation of the RDEIR. The school district has complied with the specific noticing requirement of CEQA. Please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. No changes to the RDEIR are required.

Past projects are outside the scope of the RDEIR. Please refer to response to Letter 10c, comment 3.

Regarding alternatives to components of the project, please see response to Letter 2c, comment 22.

Regarding on-campus traffic circulation, access, etc., see response to comment 1 above. Please also see response to Letter 14-5-x. Otherwise, this comment does not raise an environmental issue and therefore, no response is necessary.

5. This comment is regarding lighting impacts. See Section 5.0, Aesthetics, of the RDEIR. See also response to Letter 2b, comment 2.

The project site is not located within the boundaries or jurisdiction of the City of Carmel-by-the-Sea. Please see Section 3.0, Environmental Setting, of the RDEIR. Please also see response to Letter 2b, comment 4, as well as response to Letter 11b, comment 16.

Regarding implementation of mitigation measures, mitigation measures adopted by the school district board are legally binding. (See Pub. Res. Code, §21081.6(b); CEQA Guidelines, §15126.4(a)(2).)

Regarding Dark Skies and proximity to homes, see response to 14-3-h, comment 4.

Table 4-3 presents the Proposed Stadium and Pool Facility Lighting Schedule, include the month and number of days, the start time and the end time.

Golfing, shopping, dining, and site-seeing in Carmel are outside the scope of the RDEIR and the CEQA process. The comment does not identify an environmental impact.

Regarding the Point Lobos ParkIT! Shuttle Program, please see response to Letter 14-2-b, comment 2.

Aesthetics is addressed in Section 5.0 of the RDEIR. Air Quality is addressed in Section 6.0 of the RDEIR. Biological Resources is addressed in Section 7.0 of the RDEIR. Energy is addressed in Section 8.0 of the RDEIR. GHG Emissions is addressed in Section 9.0 of the RDEIR. Noise is addressed in Section 10.0 of the RDEIR. Transportation and Parking is addressed in Section 11.0 of the RDEIR. Soils, Erosion, and Water Quality are addressed in Section 5.0 of the RDEIR. Cumulative Impacts is addressed in Section 15.0 of the RDEIR. No changes to the RDEIR are necessary.

6. Regarding construction of the project components, sufficient detail was provided in order to evaluate the environmental effects. Please see Section 4.0, Project Description, of the RDEIR. No further project details are necessary and no changes to the RDEIR are necessary.

For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. Please also see responses to Letter 14-4-a, comment 1, and Letter 14-2-c, comment 2.

7. Regarding impacts to sensitive biological resources, see Section 7.0, Biological Resources in the RDEIR. The RDEIR evaluated the potential for 43 special-status plant species (Table 7-1, Special-Status Plant Species with Potential to Occur in the Project Vicinity) and 27 special-status wildlife species (Table 7-2, Special-Status Wildlife Species with Potential to Occur in the Project Vicinity) to be affected by the proposed project. See also response to Letter 131 from the California Department of Fish and Wildlife.

For information regarding the CEQA process and recirculation, please see response to comment 6, above.

8. Regarding energy, see Section 8.0, Energy, of the RDEIR, as well as response to Letter 182a.
9. Regarding greenhouse gas emissions, this analysis in Section 9.0, Greenhouse Gas Emissions, evaluated emissions from the entire project including addition vehicle miles traveled, and construction and operation of the project. Air quality, greenhouse gas emissions, and energy modeling results are included in Appendices G and H of the RDEIR.

Regarding project scope and the CEQA process, please see response to comment 6, above.

10. Regarding emergency access routes, see response to comment 1 above, as well as response to Letter 14-2-f. Past projects and their respective CEQA process are outside the scope of the RDEIR. Please see response to Letter 10c, comment 3.
11. Regarding the tennis team students vehicle miles traveled to Carmel Valley Athletic Club and Mission Ranch, see response to Letter 14-4-e.
12. Regarding the trees on campus along State Route 1, see response to Letter 14-3-n. No further analysis is required and no changes to the RDEIR are necessary.
13. This comment is regarding Late Start and does not raise an environmental issue. Therefore, no response is necessary.

14. Regarding parking, the proposed project includes adding 111 parking spaces. The project does not include parking on the outdoor amphitheater or the baseball field. See responses to Letter 14-2-o, comment 2; Letter 13b, comment 2; and 14-3-c. Regarding traffic circulation (existing and proposed) see Figures 3-6 and 4-6 of the RDEIR. No changes to the RDEIR are necessary.
15. This comment is regarding bleachers and emergency access. The proposed project includes a storage facility with a standing platform with a capacity for approximately 178 spectators (see page 4-6 of the RDEIR. Additionally, see response to comment 1 above and Letter 2c, 11, and Letter 14-2-f regarding emergency access.

Past projects and their respective CEQA process are outside the scope of the RDEIR. Please see response to Letter 10c, comment 3.

16. Regarding noise, the evidence shows that the proposed project would not result in a significant noise impact from traffic and stadium noise. See Section 10.0, Noise of the RDEIR, Appendix A of this final EIR and responses to Letter 72j and 72 k, and Letter 96.
17. Moving the high school to Carmel Middle School is not part of the project, and this comment does not raise environmental issues associated with the project. Please see response to Letter 132b, comment 9. The RDEIR studied an alternative of constructing a lighted stadium at Carmel Middle School. See Section 16.0, Alternatives. The commenter also notes that the 2019 Facilities Master Plan shows lighted field at the middle school. The master plan also shows the proposed lighted stadium at the high school. The remaining comments do not raise an environmental issue. No changes to the RDEIR are required.
18. The environmental setting in the RDEIR is adequate in order to evaluate the environmental impacts of the proposed project and satisfies the requirements of CEQA. Please refer to Section 3.0, Environmental Setting, of the RDEIR. Regarding Safe Routes to School, see response to Letter 14-4-o. The commenter requests that the school district immediately implement the Traffic Management Plan now. The school district would prepare and implement a final plan for highly-attended events if the project is approved. Please refer to discussion in Section 11.0, Transportation and Parking, of the RDEIR.
19. This comment is regarding the Traffic Management Plan. Implementation of the Traffic Management Plan during highly-attended events would ensure adequate access, circulation, and safety. Please see further discussion in Section 11.0, Transportation and Parking, of the RDEIR. An encroachment permit from the County of Monterey may be required, but consultation with Supervisor Adams is not required in order to implement the plan. See response to Letter 14-2-s. No changes to the RDEIR are necessary.

Regarding the Traffic Management Plan, see Section 11.0, Transportation of the RDEIR, as well as responses to Letter 2b, comment 3; Letter 2c, comment 5; Letter 5, comment 5; Letter 10c, comments 1 and 2; Letter 10f; Letter 13b; Letter 14-1-k; Letter 14-1-q; Letter 14-2-g; Letter 14-3-c; Letter 14-3-r; Letter 14-3-y; Letter 14-4-t; Letter 14-5-w; Letter 14-6-v; Letter 14-6-2; Letter 29a; Letter 72h; Letter 97; and Letter 104. No changes to the RDEIR are required.

20. This comment is also about the Traffic Management Plan. See response to 19 above.
21. See response to Letter 10f, comment 4.
22. This comment is regarding the commenter's request to fix the light pollution at the pool. See response to Letter 10b, comment 3.
23. This comment is about the baseball field, which is not part of the proposed project. See response to Letter 14-1-g, comment 4. Therefore, no response is necessary.
24. This comment is regarding Monterey County regulations and visual impacts. See response to Letter 2b, comment 4, and response to Letter 11b, comment 16. Visual impacts of the proposed project as viewed from State Route 1 are addressed in Section 5.0, Aesthetics. See also response to Letter 14-3-w.
25. Regarding cell towers, see response to letter 14-1-v.
26. Regarding the visual simulations and the choice of Key Observation Points (KOPs), see response to Letter 2b, comment 2; Letter 2c, comment 1; Letter 14-2-m; Letter 14-4-g; Letter 96; Letter 103a; Letter 114b; and Letter 132b, comment 4.
27. Regarding budgets, CEQA does not require identifying the budget for a proposed project. No environmental issues are raised. Therefore, no response is necessary.
28. Regarding competitive bidding and Musco, see response to Letter 2c, comment 21; Letter 63b, comment 2; and Letter 114b, comment 2.
29. Regarding the Superintendent's hours, duties, and responsibilities, this comment does not raise an environmental issue and therefore, no response is necessary

Regarding Board Policy 1330, this policy is regarding the use of school facilities under the Civic Center Act. Please see discussion of Mitigation Measure 5-2a in the RDEIR. This comment does not raise an environmental issue and therefore, no response is necessary.

Regarding dark sky certification and distance to neighborhoods, see response to Letter 14-3-h, comment 4.

Regarding the comment about “green building,” please see response to Letter 2b, comment 1.

Regarding story balloons and story poles, see response to Letter 2c, comment 1.

Regarding a fee-based video service, this comment does not raise an environmental issue and therefore, no response is necessary.

30. This comment letter is about the proposed project objective to “provide the capability to host sport events and games for Carmel High School students in the evening when students, parents, and community members can more easily attend.” See response to Letter 2b, comment 1.
31. Regarding a Mitigation Monitoring and Reporting Plan, this plan is not required to be in the EIR; however, the school board will be required to adopt one if, and when, they approve the project. No changes to the RDEIR are required.
32. Regarding local policies, zoning ordinances and regulations, and consistency with them, see response to Letter 2b, comment 4, and Letter 11b, comment 16.
33. Regarding evaluating impacts associated with the alternative of a lighted stadium at Carmel Middle School in the RDEIR, aesthetics is evaluated beginning on page 18-24, air quality and greenhouse gas emissions are evaluated on page 18-25, biological resources are evaluated beginning on page 18-25, noise is evaluated on page 18-26, soils erosion and water quality is evaluated on page 18-27, tribal and cultural resources are evaluated beginning on page 18-27, and recreation is evaluated on page 18-28. No additional data is required.
34. The commenter questions the project description of the alternative of a lighted facility at the middle school and the associated costs, but does not raise an environmental issue. Therefore, no response is necessary.
35. This comment is about athletics at the middle school. It does not raise an environmental issue, and therefore, no response is necessary.
36. Comment noted. Construction of the proposed lighted stadium at the middle school may result in tree removal, as discussed in Section 18.0, Alternatives of the RDEIR.
37. Comment noted. The commenter discussed the existing parking at the high school and middle school, but does not raise an environmental issue; therefore, no response is necessary.
38. This comment is about an approved, but not yet developed residential project adjacent to the middle school, and the environmental review documentation associated with it. This comment does not raise an environmental issue about the proposed project or the referenced alternative and therefore, no response is necessary.



39. This comment is about the budget for master planning at the middle school. This comment does not raise an environmental issue about the proposed project or the referenced alternative and therefore, no response is necessary.
40. Comment noted. The commenter reiterates the project objectives that are not met with the lighted stadium at the middle school, (Alternative 4) and raises concerns that this alternative does not include the other project components at the high school. See Alternative 5, Reduced Project Alternative, that includes all of the project components except for the lights. The school board has the discretion to approve both Alternatives 4 and 5. Past projects are outside the scope of the RDEIR. Please refer to response to Letter 10c, comment 3. No changes to the RDEIR are required.
41. The commenters present their opinions about the merits of various project components. Regarding the pool lights, the proposed project includes retrofitting the existing pool lights to reduce their impact. “Fixing” lights throughout the campus is not included in the project description. Regarding the significant and unavoidable lighting impact, this comment is noted. Regarding the viewing platform/storage building and the 18-foot roadway, these are part of the project description (see Section 4.0, Project Description in the RDEIR) and its environmental impacts are addressed throughout the RDEIR. The details in the RDEIR regarding these project components are sufficient for environmental analysis. Fixing the tennis courts is not included in the project description. Late Start is not part of the project description, but it is a project objective. Regarding the facilities master plan, this comment does not raise an environmental issue and therefore, no response is necessary. Please also see responses to Letter 2c, comment 22, Letter 14-1-g, comment 4, and Letter 14-2-g, comment 2.
42. Regarding the environmental setting associated with existing parking and circulation at the high school, see Section 3.0, Environmental Setting, specifically the discussion about circulation and on-campus and off-campus parking beginning on page 3-21. No changes to the RDEIR are necessary.
- Regarding parking, the proposed project includes 111 additional on-campus parking spaces. Regarding impacts associated with parking and circulation, see response to comment 1 above.
43. This comment is about past projects at the high school campus, and questions about general campus planning. Past projects are outside the scope of the RDEIR. Please refer to response to Letter 10c, comment 3. The comment does not address the proposed project or the RDEIR, therefore, no response is necessary.

44. Regarding the request for a vehicular access and circulation study, see response to comment 1 above.
- Regarding ticketing, this is not an environmental issue and therefore, no response is necessary.
45. This comment does not raise an environmental issue and therefore, no response is required. With respect to community engagement and the CEQA process, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.
46. Regarding emergency access routes, see response to comment 1 above, and response to Letter 14-2-f.
47. Regarding Resident Parking Only Signage, this does not raise an environmental issue. However, the school district is not opposed the resident only parking in the surrounding neighborhoods; however, the school district has no authority to implement this. It would be the responsibility of the County of Monterey. Please see response to Letter 132b, comment 9.
48. Regarding safe routes to school, see response to Letter 14-4-o.
49. Preparation and implementation of a final Traffic Management Plan would be implemented upon approval of the project and when it is required.
50. See response to comment 1 above.
51. Regarding the facilities master plan, this comment does not raise an environmental issue and therefore, no response is necessary.
52. This comment is about past projects on the high school campus. Past projects are outside the scope of the RDEIR. Please refer to response to Letter 10c, comment 3. It is not about the proposed project and does not raise an environmental issue. Therefore, no response is necessary.
53. This comment is a series of photographs regarding on-campus traffic circulation, congestion, traffic flow, and emergency access. See response to comment 1 above, and response to Letter 14-2-f.

This comment continues with a series of photographs regarding parking on Morse Drive, south of the high school campus. It does not raise an environmental issue regarding the proposed project and therefore, no response is necessary.

54. This comment is regarding a Whitson Engineering Contract for an area of boundary survey at the baseball field gate access. It does not raise an environmental issue regarding the proposed project and therefore, no response is necessary.
55. This comment is a series of pictures at State Route 1 and North Carmel Hills. It does not raise an environmental issue regarding the proposed project and therefore, no response is necessary.
56. This comment is about Mitigation Measure 11-4 and alternative mode encouragement. See response to Letter 14-1-q, comment 2.
57. This comment is about Alternative 4. See response to comment 40 above.

From: **don donhubbardlaw.com** <[don@donhubbardlaw.com](mailto:don@donhubbardlaw.com)>  
Date: Sun, Oct 9, 2022 at 4:37 PM  
Subject: CHS stadium lighting/additional parking  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>, [wilsonalison715@gmail.com](mailto:wilsonalison715@gmail.com) <[wilsonalison715@gmail.com](mailto:wilsonalison715@gmail.com)>, [darrahb@sbcglobal.net](mailto:darrahb@sbcglobal.net) <[darrahb@sbcglobal.net](mailto:darrahb@sbcglobal.net)>, Dan Paul <[dpaul@carmelunified.org](mailto:dpaul@carmelunified.org)>, Ted Knight <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>  
Cc: Lawrence E. Biegel <[larry@biegellaw.com](mailto:larry@biegellaw.com)>

Dear Members of the Board and Administrators of the Carmel Unified School District (CUSD):

1 | My wife, Darrah Blanton and I reside on Morse Drive adjacent to the Carmel High school baseball field. We have lived here for 38 years and our twin daughters were 2005 honor graduates. Until recently, we have enjoyed having the high school as our neighbor. However, the expansive construction of the high school baseball training facility, the proposed demolition of the high school tennis courts, and the installation of stadium lighting are disturbing and will negatively affect the quiet enjoyment of our home. CUSD's recent conduct shows a disregard for the environment, seismic safety and in some instances, the law.

The Proposed Stadium lights

2 | Despite the District's statements that stadium lights are needed for other winter sports such as field hockey and cross country, the primary motive for stadium lighting is for five or six Friday night home football games.

3 | I've heard it stated by proponents that Friday night football games will increase student participation and school spirit. Having played high school football on Friday night, I know this may be true. I also suspect that it will attract others, students included, who will have a great place to party after consuming spirits. Busing students from the middle school for the games does not sound feasible and will probably not curb the partying.

4 | I have regularly attended many Saturday afternoon CHS football games. The attendance has been good and the fans are enthusiastic and knowledgeable. The addition of stadium lighting for the five or six Friday night football games will have a limited benefit for a small percentage of students, fans and faculty. It will also warrant the need for increased staff supervision, increased security, parking and the expenditure of millions of dollars. This money could be well spent elsewhere to greatly improve our schools.

Parking for the Friday night games

- 5 | As neighbors on Morse Drive, we have seen the ebb and flow of CHS parking on our street. Currently the parking has been limited to the afternoon, which has been preferable. We have always had special events parking on our street, such as for graduation, and have offered additional parking in our driveways to friends and family. Parking for Friday night football games would be a zoo in our neighborhood, including parking on the proposed tennis court site.
- 6 | Entry and exit from the tennis court site will pose a serious traffic hazard in proximity to Highway 1. Parking on the tennis court site may also pose a significant risk to seismic safety, given the instability of the hillside upon which it sits. The stairway access from the baseball field to the courts has been closed due to the hillside instability. Hopefully a seismic safety or geo stability assessment has been done to insure that the weight of 75 cars will not create a dangerous situation. Destruction of the tennis courts will be a loss to the students and members of our community, many of whom have contributed to maintaining and using the courts for many years.
- 7 | Parking exists at the baseball field, which is rarely full during school hours. There is also parking for at least 50-75 cars under the artificial turf installed for the illegally constructed baseball training facility. A local construction firm, probably Granite, spent weeks grading, leveling and surfacing an extensive area, ostensibly for additional parking. It was then covered in artificial turf. If the training facility was moved to the left field side of the baseball field (with required EIR and other permits), substantial parking would be available for current and future needs.
- 8 | As evidenced above, and despite the voluminous, self serving Revised EIR, the addition of stadium lights will be of limited benefit for a minority of students and others, for an undetermined duration. The cost will be millions of dollars in valuable school district funds and the immeasurable damage to our local environment.

Sincerely, Don Hubbard

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## Response to Letter 175, Don Hubbard

1. Comment noted. The commenter expresses his opposition to the proposed demolition of the tennis courts and stadium lights, as well as to past construction of the baseball training facility. Past projects are outside the scope of the RDEIR. Please refer to response to Letter 10c, comment 3. Changes to the baseball field and facilities are not included in the project description and are outside the scope of the RDEIR. Please see Section 4.0, Project Description, of the RDEIR, and response to Letter 14-1-g, comment 4. No environmental issues regarding the proposed project are provided and therefore, no response is necessary.
2. Comment noted. The comment expresses the commenter's opinion regarding the motivation for the project. It does not raise an environmental issue and therefore, no response is necessary.
3. Comment noted. Alleged incidents of partying and consuming spirits are not the subject of the RDEIR and are outside the scope of the CEQA process. It does not raise an environmental issue and therefore, no response is necessary.
4. Comment noted. The comment states the commenters concern with Friday night games and increased costs. It does not raise an environmental issue and therefore, no response is necessary.
5. Regarding parking for Friday night football games, the proposed project includes 111 new on-campus parking spaces. Additionally, parking was addressed in Section 11.0, Transportation and Parking in the RDEIR. Mitigation Measure 11-4 requires preparation and implementation of a traffic management plan that further addresses parking requirements for highly-attended events at the high school.
6. Regarding entry and exit from the proposed parking lot at site of the tennis courts, see response to Letter 14-4-u, associated with implementation of the traffic management plan. Regarding construction of the parking lot and seismic safety, the parking lot will be built to State of California standards and review and approved by the Division of the State Architect. Regarding the baseball stairs, improvements to the baseball field and facilities are not included in the project description and are outside the scope of the RDEIR. See response to Letter 14-4-n, comment 1.
7. Comment noted. The commenter recommends removing the baseball training facility and using the parking underneath. As discussed under comment 1, past projects are outside the scope of the RDEIR. Regarding parking at the baseball field, please refer to response to Letter 14-1-g, comment 4, and response to Letter 14-2-o, comment 2. This comment does not raise an environmental issue and therefore, no response is necessary.



8. Visual impacts associated with the stadium lights are addressed in Section 5.0, Aesthetics, of the RDEIR. The impact was determined to be significant and unavoidable, even with implementation of mitigation measures limiting the use of the lights.

From: **Darrah Blanton** <[darrahb@sbcglobal.net](mailto:darrahb@sbcglobal.net)>  
Date: Sun, Oct 9, 2022 at 4:45 PM  
Subject: Objection to Revised EIR Carmel Stadium Lights  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

### Objection to Revised EIR Carmel Stadium Lights

1 | Last year, my husband and I strenuously objected to the initial Stadium Lights proposal. The expansion and scope of the revised EIR is appalling and exasperating. Tearing down the tennis courts and cutting down trees to build a parking lot and road is unconscionable. I live two doors south of CHS and observe 30 open parking spaces at the baseball field every day. I would rather cars park in front of my house than to pave paradise to put up a parking lot.

2 | Daytime football on Saturdays has worked since the inception of CHS. The Santa Lucia range provides unparalleled views at daytime games. Spectators are more likely to be under the influence of alcohol and drugs for night time games. The proposal would be over 5 million dollars and with 5-6 football games a year, that's a million dollars a game! Over the course of 10 years, it is still \$100,000 per game. Building costs have skyrocketed in the past few years, interest rates are rising and who knows how much will be spent on litigating the project. This exorbitant expenditure can be saved or put to much better use for the benefit of all 800 students at CHS, Football and field hockey are sharing the field and can continue to do so. Teaching cooperation is a better goal than this injurious proposed project.

3 | The CUSD Board's mission statement and beliefs state many positive goals to develop our students. The revised project is a slap in the face to the stated belief, "we have responsibility for the environment." There is nothing about this project that enhances the goals. Carmel High School is already overbuilt in a residential community. There are hardly any lights in Carmel. There are already a plethora of lights at the high school and adding 80 foot light towers indefensible. CHS needs to be a good neighbor. There is no benefit to spending \$5 million or more for night football, parking lots and storage buildings. Please abandon all aspects of this project and be happy with the jewel of a campus we already enjoy.

Sincerely,

Darrah Blanton  
[darrahb@sbcglobal.net](mailto:darrahb@sbcglobal.net)

## Response to Letter 176, Darrah Blanton

1. The commenter expresses opposition to the proposed project and concern about removing the tennis courts and impacts to trees. Impacts associated with removing the tennis courts and building a parking lot are addressed throughout the RDEIR. Potential impacts to trees are specifically addressed in Section 7.0, Biological Resources.
2. This comment raises concerns with building costs. It does not raise an environmental issue and therefore, no response is necessary.
3. This comment is regarding lighting impacts, which are addressed in Section 5.0, Aesthetics, of the RDEIR.

More People, More Noise, More Traffic, More Lights, More Problems,

TO: Superintendent Ted Knight  
VIA: feedback@carmelunified.org

Carmel Unified School District,  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

More Money - please Vote "NO" ON Stadium Lights!

We have serious concerns regarding your Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

You Work Here  
The Kids go to  
School Here  
"We" Live Here!

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

- CHS: 22-acres, land-locked campus, 968 students/staff, 276 parking spaces.
- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

- 810 Fire and Life Safety forms have never been filed with DSA on any of your construction projects.
- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!

Joe Krings  
10/5/2022 - 3810 Whitman Circle  
CARMEL CA 93923



**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
- Please include all the workstreams you promised during special sessions.
- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - *Updating required school area warning signage*
  - *Consider posted speed reductions down to 15 MPH in school areas*
  - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
  - *Exploring additional stop sign controls at intersection*
- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
- All off-campus parking, shuttle service and alternative mode of services are not enforceable (voluntary). The TMP provides little detail of how they would "advertise, communicate, reward or encourage".
- Parking Management is identified only for the residents surrounding the east side of CHS, not the west side where the overflow will now find relief and cause problems.



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**Fix the light pollution emitting from the pool lights you installed without a legal CEQA process.**

- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

**Include the baseball field as part the Environmental Impact and Athletic Improvement Assessment.**

- There is a dangerous and closed-off walk-way up to the back-side of the stadium, can you fix?
- Can you confirm that the gate access is approved as an Emergency Access Route? Can a vehicle safely fit there?

**Don't shrinking the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve. All impacted geographies should be in Environmental Settings.

**Provide the exact street boundary of Scenic Highway 1 as part of the protected Corridor Program.**

- GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1, and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1.

**All your photos of KOPS are consistently taken at the lowest point of impact. We want the highest impact points.**

- We'd like to see Figure 4-2 Candela Measurement Summary - Edge of Campus and provide photos from the various high points of light spill. Extrapolate this figure out until it reaches zero for all points.
- Specify the exact nighttime you are simulating? Show us 9 PM.
- What is the KOP of the Scenic Highway (day/night) where most of the stadium site is largely visible from the highway?

**Included detailed costs and budget breakdown associated with each of components of the project.**

- If one of your stated objective is to meet school budget requirements, where are the costs estimates?
- Please include a breakdown of all attorney fees associated with the stadium lights project.

**Clarify CUSD's competitive bidding process and selection criteria for each the agencies on this project.**

- Why do we only see Musco as a vendor and why is there only one design?
- Do we really need a "Show Light Entertainment" packaging on Appendix C Page 13.
- What was the process for selecting EMC Planning Group, Whitson Engineers, and Hexagon Transportation?

**CEQA requires Environmentally Superiority Alternatives. This is ours:**

- Fix the Pool Lights to improve candelas down to 17 at grade and 341 at 15 below. Implement Usage Policy.
- Implement "Green Building Lighting" on any existing fixtures on the campus
- No Stadium Lights: Significant and Unavoidable Impact even with Mitigation Measures
- No Viewing platform/storage building: Concept stage, encourages VMT, increases GHG emissions & Energy
- No 18-foot Roadway: Not required and too close to Scenic Highway 1, encourages VMT, increases GHG & Energy
- Fast track Late Start outside of the CEQA process. It's not a construction project.
- Properly assess the long-term viability of future growth at CMS. No short-term fixes at CHS.

**It's time to shut down this plan due to pollution, safety and the impact on our community.**

**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: \_\_\_\_\_

DATE: \_\_\_\_\_

CONTACT INFORMATION: \_\_\_\_\_



## Response to Letter 177, Joe Krings

1. The comment expresses opposition to the project. See responses to Letter 2c.

From: **Tucker Ramsay** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sun, Oct 9, 2022 at 7:33 PM  
Subject: My Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from from the Carmel Views neighborhood.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr on 12/7/2021 at 5:48pm:

[https://drive.google.com/file/d/1mOqyqkOWRp60fDM\\_IrzgQMFtarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyqkOWRp60fDM_IrzgQMFtarGEWSS2/view?usp=sharing)

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<https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

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- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County’s noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

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C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

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B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments



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(Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light poles will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

This is the worst possible proposed project I have ever witnessed in my 39 years of living in Carmel. ALL OF THE ABOVE REASONS the CHS RDEIR is horribly flawed are valid and worthy of further fighting if the CHS Board votes to pass this destructive & very problematic project.

Thank you for taking all the issues seriously,

Tucker Ramsay

Tucker Ramsay

[mstuckerr@gmail.com](mailto:mstuckerr@gmail.com)

25183 CANYON DR

Carmel, California 93923

## Response to Letter 178a, Tucker Ramsay

1. See response to Letter 2b.

From: **Tucker Ramsay** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sun, Oct 9, 2022 at 7:38 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?



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B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHwtAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

-----

## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments

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(Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light poles will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Tucker Ramsay

[mstuckerr@gmail.com](mailto:mstuckerr@gmail.com)

25183 CANYON DR

Carmel, California 93923

## Response to Letter 178b, Tucker Ramsay

1. See responses to Letter 2b.
2. The commenter expresses their opposition to the proposed project, but does not comment on the RDEIR. Therefore, no response is necessary.

----- Forwarded message -----

From: **Maureen McEachen** <[momceachen@gmail.com](mailto:momceachen@gmail.com)>  
Date: Sun, Oct 9, 2022 at 8:53 PM  
Subject: Fwd: RDEIR  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Dear CUSD board members and Superintendent Ted Knight:

1 I am writing to express strong opposition to the CHS projects proposed in the August 24, 2022 RDEIR. Our family of five moved from Monterey to Carmel in 2004 specifically to be in the Carmel School District, and we would like to support projects that support students, however not at the cost of the loss of what we greatly value and hold dear!

Our location in Carmel Views has vistas that include Point Lobos, Carmel Bay, and the mouth of the Carmel river, and we individually maintain those views with an annual expense for tree trimming.

\*(The preservation of views is included in our HOA's "CC&R's" (found here <http://carmelviews.net/wp-content/uploads/2017/12/CVCA-CCRs-2017-12-06.pdf>)

a sample is below:

4. Preservation of Views. The Owners agree that preservation of views is a primary objective for the Carmel Views Development. Accordingly, the following restrictions shall apply to protect views:

(a) No new structure or addition to an existing structure shall be constructed which would block the principal view from a neighboring (need not be contiguous) residence.

(b) No trees or shrubs shall be planted, or permitted to grow, on any Lot so as to obstruct the principal view from a neighboring (need not be contiguous) Lot, or residence.)

2 The initial proposed stadium lights project will unfortunately create an obstruction of the bay and Point Lobos both during the day and at night for us and for multiple residences within the Carmel Views community. The several "additional projects" listed below included in the RDEIR raised flags for lighting and height concerns (ie view light and environmental impacts), as well as concerns for the impacts to the scenic corridor along Highway 1, and for the cost of the project (which is not clear). They include: Pool Lights, Interior roadwork and paving, new parking stalls, new construction of 2,800 sq. ft. building with "rooftop viewing platform",demolition of Tennis Courts, internal roadway connecting Main Parking with new "tennis court" Parking Lot and "baseball field" Parking Lot; grading and improvements to roadway along Morris Dr., pedestrian walkway parallel to "connecting roadway",and safety and security lighting along these roads & paths. It will create a light dome (in addition to that of the pool lights which I can only describe currently as 'obnoxious') obstructing views further and creating further light pollution for our night skies, and blinding us to our former dark skies.

3 There has been discussion of relocation of the project to the Carmel Middle school area which would eliminate the issue of view obstruction, would eliminate the need to 'destroy' current tennis courts and provide the space to build an accessible stadium with traffic access, parking, and minimize light due to its lower and flat elevation. I would much rather put our time, energy and money supporting a project that is well thought through, even at greater cost (can we consider a ballot measure?), than to spend time, effort and money fighting to stop it and have nothing to

3  
con't. | show for it.

Please confirm you have received this letter, and I sincerely hope you are hearing these concerns and taking them to heart.

Sincerely,  
Maureen McEachen  
[momceachen@gmail.com](mailto:momceachen@gmail.com)

## Response to Letter 179, Maureen McEachen

1. The commenter expresses opposition to the proposed project and discusses homeowner association responsibilities. The district is not subject to the stated HOA CC&Rs. This comment does not raise an environmental issue regarding the proposed project and therefore, no response is necessary.
2. This comment acknowledges the components of the proposed project and expresses concern regarding light pollution. For clarification, no changes are proposed at the baseball field. Light pollution associated with the stadium lights are addressed in Section 5.0, Aesthetics, of the RDEIR. The impact was determined to be significant and unavoidable, even with implementation of mitigation measures limiting the use of the lights. For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.
3. The commenter expresses support for the alternative to construct a lighted stadium at the middle school. The environmental impacts associated with that alternative are discussed in Section 18.0, Alternatives. No changes to the RDEIR are necessary.



From: **NICHOLAS LLEWELLYN** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Sun, Oct 9, 2022 at 8:27 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.
4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.
5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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## 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from from the Carmel Views neighborhood.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr on 12/7/2021 at 5:48pm:

[https://drive.google.com/file/d/1mOqyqkOWRp60fDM\\_IrzgQMFtarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqyqkOWRp60fDM_IrzgQMFtarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr on 12/7/2021 at 6:21pm:

<https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pLL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

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- i. Disallow lights usage on weekends for any use, period.
- ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County’s noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be "Significant" per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as "Less than Significant" and should be changed to "Significant and Unavoidable".

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E. Mitigation Measure 11-4 (f) states parking will be "residents only during special events", but this is ambiguous and appears to be limited to only the largest events. Since there won't be sufficient parking for all possible events (RDEIR admits parking "would be deficient by 230 parking spaces (617 demand - 387 total spaces)"), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is "Significant and Unavoidable", which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

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B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylii*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments

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(Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light poles will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11Xl37lwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

NICHOLAS LLEWELLYN

[nickllewellyn1@gmail.com](mailto:nickllewellyn1@gmail.com)

25579 Morse Dr

Bonny Doon, California 95060



## Response to Letter 180, Nicholas Llewellyn

1. See responses to Letter 2b.

----- Forwarded message -----

From: **John Krattli** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>

Date: Sun, Oct 9, 2022 at 8:37 PM

Subject: Public Comment on RDEIR for CHS Stadium Lights

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with the proposed project.

1. The lights will significantly negatively impact the neighborhoods surrounding the high school.
2. The neighboring communities should not be subjected to the proposed light pollution.
3. I bought my house to live in a beautiful, natural area. My Carmel Knolls neighborhood does not have street lights nor sidewalks. Installing stadium lights would be totally inconsistent with this neighborhood and would severely negatively impact our night time skies.
4. At a time when we should all be concerned with global warming, the proposed lights will increase the school's carbon foot print! It is nothing short of incredible to be contemplating such a project when all of us should instead be implementing measures to REDUCE our energy use.
5. Carmel High football has done very well without football stadium lights.
6. The impacts from noise and traffic resulting from this project will be significant and negative. There will be more cars, more traffic, more vehicle emissions.
7. The Board needs to look at the broader interests involved.
8. I strongly hope that the Board will not approve such a project with such significant negative impacts on our environment based on the "need for night time football". The CUSD can and should help lead us to a better future. It is incumbent on all of us to do what we can to limit global warming. Far from being part of the solution, this project will only make matters worse.

Thank you for considering my comments,

John Krattli

John Krattli

[jkattli@gmail.com](mailto:jkattli@gmail.com)

25950, Carmel Knolls Drive

Carmel, California 93923

## Response to Letter 181, John Krattli

1. The commenter expresses his opposition to the proposed project and the negative impacts of the lights. Lighting impacts are addressed in Section 5.0, Aesthetics, of the RDEIR.
2. See response to 1 above.
3. See response to 1 above.
4. Regarding global warming and greenhouse gas emissions, see Section 9.0, Greenhouse Gas Emissions, as well as response to Letter 182a and 182b.
5. Comment noted. This comment does not raise an environmental issue and therefore, no response is necessary.
6. Noise is addressed in Section 10.0, Noise of the RDEIR. Traffic is addressed in Section 11.0, Transportation and Parking of the RDEIR. Vehicle emissions are addressed in Section 6.0, Air Quality of the RDEIR.
7. Comment noted. This comment does not raise an environmental issue and therefore, no response is necessary.
8. Comment noted. This comment does not raise an environmental issue and therefore, no response is necessary.

From: **John McEachen** <[john.mceachen@gmail.com](mailto:john.mceachen@gmail.com)>  
Date: Sun, Oct 9, 2022 at 9:03 PM  
Subject: Comments on CHS Stadium Improvements RDEIR  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Dear CUSD Board Members:

1

This is in response to the Revised Draft Environmental Impact Report of August 24, 2022, for which you have requested public comment.

The RDEIR states as its purpose the evaluation of “potentially significant adverse environmental impacts” associated with the Carmel High School Stadium Lights Project. A reasonable expectation for such a charter would be for the RDEIR to consider worst-case scenarios to identify the most significant adverse impacts.

The greenhouse gas (GHG) emissions analysis is significantly incomplete and flawed. In section 9, page 19, the RDEIR identifies Central Coast Community Energy (3CE) as the electricity supplier for the project and notes that electricity is acquired from 100% renewable sources. Consequently, the “increase in electricity demand [due to the stadium lights] would not generate new GHG emissions.” The RDEIR goes on to evaluate GHG emissions solely on vehicular traffic as shown in Appendix G of the report.

The analysis above is a best-case scenario. It washes away analysis of GHG emissions due to electricity generation by conveniently assuming 3CE will continue to provide renewable electricity in perpetuity. 3CE is an example of a new trend in energy aggregation called Community Choice Aggregation (CCA). 3CE is a new CCA that has only been in operation since March 2018.

History is replete with both profit and non-profit organizations that have collapsed due to volatile energy markets and economic conditions (e.g. Beacon Power, SunEdison, EnerDel, SpectraWatt, AstroPower, etc.) Given the RDEIR’s analysis is entirely dependent on the solvency of 3CE in perpetuity, the following questions should be answered:

- 1. What is the financial solvency of 3CE?**
- 2. Who is the contingent electricity supplier in the event of the collapse or bankruptcy of 3CE?**
- 3. What contractual relationship has been established between 3CE and the CUSD to ensure renewable electricity will be supplied for the stadium in perpetuity, thus ensuring no additional GHG emissions will be generated?**

For the RDEIR to responsibly address the worst-case scenario of adverse environmental impact, it must evaluate the GHG emissions of the stadium light project when supplied by a non-clean energy provider such as PG&E. Thus, the RDEIR should also consider the following question:

- 4. Considering the 400 practices and 124 games identified for use of the stadium lights, how many Metric Tons of CO2e will be generated when supplied by a non-clean energy provider such as PG&E?**

In addition to the concerns specifically identified above, I agree wholeheartedly with all the public comments made at the September 6, 2022 public hearing, specifically those related to the lack of alternative engineering solutions, watershed analysis, noise and traffic issues.

I strongly oppose moving forward with this project until all these issues are addressed.

Very sincerely,

John McEachen

## Response to Letter 182a, John McEachen

1. The commenter states that the RDEIR GHG analysis is entirely dependent on the solvency of 3CE in perpetuity and asks three related questions regarding financial solvency of 3CE, who the electricity provider would be if 3CE failed, and what is the contractual relationship between 3CE and the school district to ensure renewable energy will be supplied to the school district in perpetuity.

The analysis in Section 9.0, Greenhouse Gas Emissions, of the RDEIR is not entirely dependent on the assumption that all electricity supplied for the proposed project will be supplied by 3CE from renewable sources. For typical land use development projects, the dominant GHG emissions source is commonly from mobile sources; the same is true for the proposed project. This is based on both EMC Planning Group's long experience conducting GHG emissions modeling for land use/development projects subject to CEQA review as well as more generally the California 2020 GHG Emissions inventory, which shows that 38 percent of State emissions are from transportation, with no other source greater than 16 percent (electricity) other than industrial (23 percent), the latter of which is not considered to be a GHG emissions source for typical land use projects (for additional reference see: <https://ww2.arb.ca.gov/ghg-inventory-data>). Refer also the CalEEMod results included as part of Appendix G of the RDEIR. Thus, as will be discussed below, GHGs from electricity generally constitute a minor component of a project's overall GHG emissions inventory.

The question of 3CE's financial solvency is considered to be speculative and requires no further analysis per CEQA Guidelines section 15145. There is no reliable way to assess the future economic performance of a company. PG&E would be the contingent electricity supplier in the event that 3CE fails.

Regarding contractual relationships, there is no contractual relationship between the school district and 3CE and none is required to receive carbon-free electricity from 3CE. Electricity customers within 3CE's service area, which includes Carmel High School, receive electricity from 3CE on a default basis unless individual customers opt out of doing so. The school district chose not to opt out and began receiving electricity from 3CE in 2018.

The commenter notes that for the RDEIR to address worst-case GHG impacts, GHG emission from stadium lighting must be evaluated when electricity is supplied by PG&E.

All utilities in California are obligated to comply with the State's Renewable Energy Portfolio regulations. These regulations require that utilities in California provide an increasing percentage of their power from renewable energy sources over time. For example, per California Senate Bill 100, 60 percent of PG&E's electricity must be supplied from renewable sources by 2030. PG&E has already achieved its state-mandated requirement to provide 33 percent of its electricity from renewable sources by 2020 (refer to the following

PG&E website for additional details:

[https://www.pgecorp.com/corp\\_responsibility/reports/2018/bu07\\_renewable\\_energy.html#:~:text=PG%26E%20delivers%20some%20of%20the,and%20various%20forms%20of%20bioenergy](https://www.pgecorp.com/corp_responsibility/reports/2018/bu07_renewable_energy.html#:~:text=PG%26E%20delivers%20some%20of%20the,and%20various%20forms%20of%20bioenergy)).

PG&E regularly publishes data regarding the “carbon intensity” for its electricity supply. This is the volume of carbon dioxide (CO<sub>2</sub>) generated per megawatt hour (MWh) of the energy it generates. The last published value was 2.68 lbs CO<sub>2</sub>/MWh in 2019. ([https://www.pgecorp.com/corp\\_responsibility/reports/2021/pl02\\_climate\\_change.html](https://www.pgecorp.com/corp_responsibility/reports/2021/pl02_climate_change.html)). This value considers the renewable energy currently being acquired by PG&E as required to meet its renewable energy portfolio requirements. The value will continue to decline over time as the percentage of renewable energy provided by PG&E increases over time.

Per data provided by Musco Lighting included in Appendix C of the RDEIR, the stadium lights have a total “load” of 52.92 kilowatts (kW). The load is the amount of energy a building/appliance requires to operate, measured in kW. Table 4-3, Proposed Stadium and Pool Facility Lighting Schedule, in the RDEIR identifies projected stadium lighting hours of use over the course of a year. Using an average lighting start time per each month, the planned end time for events each month, and the number and type of events per month that require lighting, the stadium lights would be in operation for approximately 327 hours per year. Total annual electricity demand from lighting would; therefore, be equivalent to 52.92 kW x 327 hours = 17,305 kWh, or 17.31 MWh per year. Annual GHG emissions from stadium lighting would be 17,305 kWh x 2.68 lbs CO<sub>2</sub>/MWh, or 46.39 lbs per year. This is equivalent to 0.023 tons per year or 0.021 metric ton tons per year. This volume is based on carbon intensity of PG&E’s electricity supply, which as noted above, has already reached 30 percent renewable sourced. This volume of GHG emissions is inconsequential regarding the conclusions of GHG impact analysis included in the RDEIR.

Changes have been made to the RDEIR to incorporate the GHG emissions volume for the stadium lighting. Refer to Section 3.0, Changes to the RDEIR, of this final EIR.



From: **John McEachen** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Mon, Oct 10, 2022 at 9:50 AM  
Subject: Comments on CHS Stadium Improvements RDEIR  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

Dear CUSD Board Members:

This is in response to the Revised Draft Environmental Impact Report of August 24, 2022, for which you have requested public comment.

1 The RDEIR states as its purpose the evaluation of “potentially significant adverse environmental impacts” associated with the Carmel High School Stadium Lights Project. A reasonable expectation for such a charter would be for the RDEIR to consider worst-case scenarios to identify the most significant adverse impacts.

The greenhouse gas (GHG) emissions analysis is significantly incomplete and flawed. In section 9, page 19, the RDEIR identifies Central Coast Community Energy (3CE) as the electricity supplier for the project and notes that electricity is acquired from 100% renewable sources. Consequently, the “increase in electricity demand [due to the stadium lights] would not generate new GHG emissions.” The RDEIR goes on to evaluate GHG emissions solely on vehicular traffic as shown in Appendix G of the report.

The analysis above is a best-case scenario. It washes away analysis of GHG emissions due to electricity generation by conveniently assuming 3CE will continue to provide renewable electricity in perpetuity. 3CE is an example of a new trend in energy aggregation called Community Choice Aggregation (CCA). 3CE is a new CCA that has only been in operation since March 2018.

History is replete with both profit and non-profit organizations that have collapsed due to volatile energy markets and economic conditions (e.g. Beacon Power, SunEdison, EnerDel, SpectraWatt, AstroPower, etc.) Given the RDEIR’s analysis is entirely dependent on the solvency of 3CE in perpetuity, the following questions should be answered:

1. What is the financial solvency of 3CE?

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con't.

2. Who is the contingent electricity supplier in the event of the collapse or bankruptcy of 3CE?

3. What contractual relationship has been established between 3CE and the CUSD to ensure renewable electricity will be supplied for the stadium in perpetuity, thus ensuring no additional GHG emissions will be generated?

For the RDEIR to responsibly address the worst-case scenario of adverse environmental impact, it must evaluate the GHG emissions of the stadium light project when supplied by a non-clean energy provider such as PG&E. Thus, the RDEIR should also consider the following question:

4. Considering the 400 practices and 124 games identified for use of the stadium lights, how many Metric Tons of CO<sub>2</sub>e will be generated when supplied by a non-clean energy provider such as PG&E?

2

In addition to the concerns specifically identified above, I agree wholeheartedly with all the public comments made

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.

2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.

3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new

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con't.

objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge "effects on scenic vistas and the visual character" of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from from the Carmel Views neighborhood.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr on 12/7/2021 at 5:48pm:

[https://drive.google.com/file/d/1mOqqyKOWRp60fDM\\_IrZgQMFarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqyKOWRp60fDM_IrZgQMFarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr on 12/7/2021 at 6:21pm:

<https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pIL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this

by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County’s noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will

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likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be

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damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: <https://drive.google.com/file/d/1151H1r5-GUCp3GKGastHtwltAw4g9fPu/view?usp=sharing>

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.



2  
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ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

John McEachen

[john.mceachen@gmail.com](mailto:john.mceachen@gmail.com)

Carmel, California 93923

## Response to Letter 182b, John McEachen

1. See response to Letter 182a.
2. See response to Letter 2b.

From: **Ralf Weigel** <[weigel@laseronics.us](mailto:weigel@laseronics.us)>  
Date: Mon, Oct 10, 2022 at 7:27 AM  
Subject: Stadium lights  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Dear CUSD,  
dear Dan Paul,

1

I am writing this email to voice my strong support for the Stadium Light and all the additional improvements.

We are proud parents of 3 students, that have and have had the opportunity to go through the CUSD system.

Sports is a vital part of students' life and development and the proposed improvements are absolutely necessary.

A few Friday night games should not be such a major issue for a minority, compared to the number of students over decades.

I strongly support your project.

Best regards

Ralf Weigel  
Owner / Managing director  
[www.laseronics.us](http://www.laseronics.us)  
3667 San Gabriel River Pkwy.  
Pico Rivera, CA 90660  
+1.831.707.4445

## Response to Letter 183, Ralf Weigel

1. The commenter expresses their support for the proposed project, but does not comment on the RDEIR. Therefore, no response is necessary.

----- Forwarded message -----

From: **Troy Ishikawa** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>

Date: Mon, Oct 10, 2022 at 9:14 AM

Subject: Public Comment on RDEIR for CHS Stadium Lights

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Carmel, California is a pristine area and we, the greater community, want to continue this important and vital asset. As a primarily residential community, stadium lights do not belong here. The lights will impede on our serene and dark sky. This is one of the chief reasons why people come to live here. If the community wanted to live where the night sky is illuminated by stadium lights, they would have chosen San Jose.
2. The stadium lights will reflect into the night sky for miles around, especially when there is cloud cover.
3. What about the noise decibel factor? I can already hear Carmel High School football games from my house located over 1-mile away on Saturday afternoons during football season. In the evening hours, outdoor sound transmits readily, especially because busy traffic and other outdoor activities have subsided. Residents will hear more football games and other activities from the rental of the stadium at night from here on out, if the stadiums lights are approved.
4. Does Carmel Unified School District really needs another revenue stream? As a basic aid district, CUSD does not rely upon average daily attendance for funding. CUSD should seriously consider how much water they waste and retrofit all of the plumbing. As an affluent district why hasn't this been a priority? In comparison, Monterey Peninsula Unified School District uses far less water per capita and has spent funding to retrofit their properties.
5. Please do not approval CHS's stadium lights. The lights will forever change Carmel's night sky and create animosity towards CUSD and Carmel will become a divisive community.

Sincerely,

Troy Ishikawa

CHS Class of '83

Troy Ishikawa

[ishikawatroy@yahoo.com](mailto:ishikawatroy@yahoo.com)

Carmel, California 93923

## Response to Letter 184, Troy Ishikawa

1. The commenter expresses their concerns for the proposed project's impacts to the night sky. While the proposed stadium lights would have a significant and unavoidable adverse environmental impact on the night sky in the vicinity when the lights are turned on, the lights will be dark-sky certified by the International Dark-Sky Association (IDA). See Section 5.0, Aesthetics, for a visual impact analysis of the proposed project and additional discussion about the school district's process for this certification process. No changes to the RDEIR are necessary.
2. Regarding the marine layer, see response to Letter 2b, comment 2.
3. The commenter expresses their concern over nighttime noise levels increases at the high school as a result of the proposed project. Noise impacts and mitigations are addressed in Section 10.0., Noise, of the RDEIR. See also the supplemental noise analysis included as Appendix A of this final EIR. No changes to the RDEIR are necessary.
4. The commenter questions the school district's revenue stream for the proposed project, The commenter also expresses their opposition to the proposed project, but does not comment on the RDEIR. Plumbing retrofits are not included in the project and are outside the scope of the RDEIR. Likewise plumbing retrofit projects at other school districts are not the subject of the RDEIR. Therefore, no response is necessary.
5. The commenter requests the school district board to not approve the proposed project, but does not comment on the RDEIR. A decision on the project's merits will be made by the Board, who will consider all comments. Therefore, no response is necessary.



# SCARBOROUGH LAW

Email:  
tiffany@tpscarborough.com

Website:  
www.tpscarborough.com

October 10, 2022

**Sent via Email Only**

Carmel Unified School District  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road  
Carmel, CA 93923  
feedback@carmelunified.org

**Re: Carmel High School Stadium Improvements, Carmel, California**

Dear Mr. Paul and Carmel Unified School District Board of Education Trustees,

1

This office represents Save Carmel, a local organization of concerned Carmel residents. I submit the following comments to the Revised Draft Environmental Impact Report (“RDEIR”) on behalf of Save Carmel, which includes numerous group members, some of which have been improperly called out and vilified in the media and on social media by Carmel Unified School District (“CUSD”) representatives for their engaging in the CEQA and CPRA process, which is their *right*.

2

First, the Carmel High School Stadium Improvements project (“Improvements Project”) far exceeds the scope of the original Stadium Lights project. Despite the vastly expanded scope of work, CUSD, at your direction, failed to engage in a new scoping process and appears to have misled the community into believing that the Improvements Project relates narrowly to the installation of lights at the CHS field for *only* 5-6 football games per year. As a policy question, why didn’t the CUSD adequately notify the community of the vast scope of the Improvements Project? Are the CUSD, the superintendent or the BOE trustees trying to hide the scope of this project from the community? It would seem that transparency, which you profess to want, is not something that CUSD really seeks to achieve. As a policy question, do you not owe a duty of full and complete disclosure to the community you serve?

3

The new 18-foot access road, in conjunction with new parking lots and an expanded driveway to the baseball field that you propose is concerning on several levels. They will have significant safety and congestion impacts on Protected California Scenic Corridor Hwy 1 (“Scenic Hwy 1”) and surrounding Carmel High School (“CHS”), including but not limited to additional traffic on Scenic Hwy 1, safety of ingress and egress to the new parking lot on Morse Drive where the tennis courts will be ripped out for a parking lot, the safety of an 18-foot access road that is sandwiched between Scenic Hwy 1 and the football field (literally butting up next to the track), removal of the mature trees lining Scenic Hwy 1 and those next to the tennis courts, lack of a Vehicular Access and Circulation Study, lack of

3  
con't. appropriate fire and safety routes, failure to address ingress and egress of the access road into the main CHS parking lot adjacent to the entrance from Scenic Hwy 1, building “concepts” that have not been fully established, traffic congestion that has not been fully studied, as well as the impacts on local wildlife and fragile ecosystems.

4 The RDEIR is intentionally vague and misleading. Much of the pertinent information is buried in appendices, making it difficult to find specific information that is only superficially addressed in the actual report. The true impacts are glossed over or ignored. The RDEIR focuses heavily on temporary impacts, such as construction work, instead of fully exploring the widespread impacts of its implementation. Furthermore, the few alleged “mitigation” measures contemplated rely on agreements or cooperation with other agencies that are not yet in place and are often hard to consistently implement and enforce. Most of these mitigation measures are temporary or at the pleasure of the CUSD and the BOE trustees, to be changed at the Board’s discretion and leisure at any time, if implemented at all once the “improvements” are installed. Numerous items are to be “figured out” as the Improvements Project progresses, with no real roadmap or budget for moving forward in a thoughtful and environmentally or safety conscious manner.

5  
INSTALLATION AND USE OF LIGHTS AT CHS  
(This will be addressed more fully under separate cover.)

Below are key points regarding the number of nights the lights will be on. These numbers are taken from the RDEIR:

- Stadium Lights: 400 practices (multiple sports) per year and up to 124 games per year (football, field hockey, boys and girls soccer, boys and girls lacrosse, track and field. This only accounts for CHS sports teams. It does not account for band practice or any community use. This *IS NOT* 5-6 nights per year but impacts the Carmel community year-round.
- Pool Lights: 150-180 night practices and 28-31 night games/meets per year (boys and girls swim meets and water polo games). This only accounts for CHS swim and water polo teams and no other community use. This will impact the Carmel community approximately 6 months of the year.

6 There was no analysis or discussion of the cumulative impacts of the stadium lights and the pool lights, which will be on *at the same time* many nights during the year. There is not discussion of the environmental impacts or mitigation measures, if there can be any, for the simultaneous use of lights.

7  
TRAFFIC

The RDEIR fails to adequately analyze the impact of additional traffic on Scenic Hwy 1 due to increased use of the CHS stadium, lacks an adequate traffic study, and fails to provide for fire and evacuation routes. It fails to address the impacts of ingress and egress to and from Morse Road to the new parking lot by the pool, or traffic flow on, to, or from the new access road.

8 The proposed Traffic Management Plan (“TMP”) does NOT shift the environmental impact to "less than significant". Instead, it is a superficial, flawed, short-term, patchwork solution for a very limited number of nighttime football games. *It fails to address any other sports or activities at CHS, despite*

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con't. | *the fact that the stadium lights will be on nearly every day/night of the year, and sometimes in conjunction with the pool lights.*

9 | The TMP fails to address when outdoor winter sports practices and games occur at the same time as basketball practices and games (with large crowds), including resultant impacts on traffic and parking or related impacts on the environment. The TMP fails to address outdoor sports practices and games that occur at the same time as volleyball and varsity baseball practices and games, including resultant impacts on traffic and parking or related impacts on the environment. Likewise, the TMP fails to address traffic and parking issues when there are 1 or more sporting events and/or practices concurrent with an event at the Performing Arts Center, including resultant impacts on traffic and parking or related impacts on the environment. No mitigation measures are proposed to deal with these parking and traffic issues, which will be a common occurrence. It is impossible to comment on potential mitigation measures when the RDEIR is silent on these subjects, pretending that they will not occur.

10 | Notably, the RDEIR says no events will occur at the same time, which is impossible given the number of practices/meets/games occurring under the lights. The RDER *only* addresses 5-6 football games per year and *ignores all else*. In fact, practices and/or sporting events will impact traffic *nearly every day of the year* given the intended use. Professing to the community that traffic will only be impacted 5-6 Friday nights per year is a fraud on the community by the superintendent and BOE trustees, intended to mislead those who you know will not read the RDEIR. This is inexcusable.

11 | What actual traffic studies were performed? How did CUSD determine that it was acceptable to divide additional Friday night traffic by 5 days per week – averaging the increased traffic over a full week? This is ridiculous considering that the impact will be on Friday nights. What industry standard, or other scientific model is this averaging based on? It appears to be a false, self-serving way to reduce the *appearance* of traffic to avoid the requirement to engage in a *true assessment* of the environmental effects of increased traffic. Anyone with any familiarity of CHS is aware that traffic on Scenic Hwy 1 is bad every day of the week, but the addition of commuter traffic, typical Friday night traffic and 1500-2000 persons entering CHS for night games will have a significant impact on Scenic Hwy 1 that is not adequately addressed, potentially making the proposed mitigation measures untenable or making the impact “significant” even after mitigation measures are in place.

12 | Also, why was traffic not addressed for any other time, day, or event(s), knowing that additional parking lots and access roads will affect traffic flow and ingress and egress? An accurate traffic study is necessary. Without an actual traffic study, considering the full extent of additional traffic to and from CHS each evening, it is impossible to fully understand and comment on the environmental and safety effects of the *substantial* increased traffic that will occur.

13 | Furthermore, how did you arrive at the 3.24 person per vehicle number or persons who will be in a car coming to CHS football games? Carmel is not like San Jose. The neighborhood where Mitty sits – if any of you bothered to look into it – is *nothing* like Carmel. What study was performed to analyze whether CHS can accurately be compared to Mitty? Or did you simply prefer to use inflated numbers that better fit your narrative? What analysis or study was performed regarding CUSD’s unique rural setting? Students and their families do not live within minutes of CHS like Mitty or other Peninsula cities. What analysis was performed to determine the number or percentage of people/cars that will

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come directly from work? Families that will not be able to consolidate cars? Underclass students who will be dropped off by their parents? Or picked up afterwards if they stay in town after school? It would appear that none of this relevant analysis was performed to determine what the actual impact of traffic on Scenic Hwy 1 will be when you add the lights that will be on nearly every night of the year. It is impossible to comment on the environmental or safety impacts of the added traffic/number of cars coming to CHS when an arbitrary (and artificially high) number of vehicle occupants was used to analyze the number of cars coming to CHS for football games and no analysis was performed as to any other sport or event, or combination of sports and/or other events.

14

It is impossible to properly analyze the mitigation measures that fail to address the true traffic impact as a result of the Improvements Project. A further, full and complete traffic study should be performed before mitigation measures can be properly addressed and before any construction takes place. Right now, you are shooting in the dark as you have no idea what traffic increases will occur and how much or often traffic will increase, thus you (and we) have no ability to properly assess the impacts of the substantial increased traffic on the environment or for safety purposes.

15

#### PARKING IN NEIGHBORHOODS

The TMP creates confusion by law enforcement between event attendees vs. residential parking and fails to address the nuisance it creates on residential streets. The TMP fails to address or acknowledge the potential use of no parking signs for adjacent neighborhoods, safety to adjacent neighborhoods including emergency vehicle access on narrow roads, or the impact of parking in Carmel neighborhoods across Scenic Hwy 1. In fact, the RDEIR ignores the fact that there *will be* people who park in the neighborhood across the street from CHS.

Execution of proposed TMP requires an "Encroachment Permit" granted by Monterey County. There is no guarantee the County will/should consistently give permission on requested dates. Encroachment permits will be required on *many more* than 5-6 football games per year, including when there are multiple events and/or events and practices, which will occur almost *every night of the year*.

CUSD has taken it upon itself to put "Event" and "No Parking" signs up in the neighborhood adjacent to CHS. CUSD has no authority to do so. What ordinance, policy, or state or federal law does CUSD and the BOE trustees rely upon to engage in what appears to be conduct that is illegal and beyond the scope of CUSD's authority? What will happen if CUSD cannot use "Event" or "No Parking" signs to keep attendees from parking in the neighborhood adjacent to CHS? What studies and/or analysis was conducted to determine the environmental and safety impacts of parking in the neighborhood directly adjacent to CHS given the amount of increased attendance you anticipate? What studies or analysis was performed to determine the environmental and safety impacts on the neighborhoods across Scenic Hwy 1 from CHS if parking is not allowed in the neighborhood adjacent to CHS or if that neighborhood fills up? It appears that the neighborhoods (particularly the one adjacent to CHS) will be subject to constant traffic, increased parking that will make it impossible to have guests, added traffic noise that would include cars, honking, and yelling by attendees (particularly after a win). They will be subject to increased trash left by attendees. They will be subject to unsafe conditions if emergency vehicles cannot safety access or navigate the streets. This is a real threat when there are cars parked on both sides of the street and cars parked illegally, and when there are long lines to enter Morse drive,

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causing traffic to back up on Scenic Hwy 1, or exiting Morse drive, causing traffic to back up down the street. It is impossible to fully evaluate the environmental and safety impacts of parking in these neighborhoods since no meaningful analysis was performed. It is impossible to comment meaningful mitigation measures when none were analyzed or included in the RDEIR. The alleged TMP is not a meaningful mitigation measure, considering it is based on illegal traffic control by CUSD. The addition of over 800 cars in the adjacent neighborhood if the TMP cannot be implemented was not adequately addressed either. This is an environmental and safety problem with no tenable mitigation solution with potentially disastrous results for all involved.

## THE NEW ROADS

16

### The New Driveway to the Baseball Field

A “concept” for a new “driveway” to the baseball field is buried in the RDEIR. It is unclear exactly what the driveway will entail. It does appear, however, that it will cut-into or otherwise affect the hillside, including where the pedestrian path is down to the baseball field. It will also potentially impact traffic on Morse drive, particularly in conjunction with the new parking lot and the new 18-foot access road.

What studies were performed to determine whether the “driveway”, i.e., road can be safely expanded into the hillside? What studies were performed regarding the effects of new topography created by cutting into the hill and new grading? What drainage analysis was done? What analysis was performed to determine the effects on the animals, plants, and ecosystems within the area of the expanded “driveway”? Has anyone evaluated the stability of the hill or whether the expanded driveway road will lead to rock/mud slides? It is impossible to comment on these issues when no analysis was performed, and no meaningful mitigation measures were included in the RDEIR.

17

### The New 18-foot Access Road

The “conceptual” 18-foot access road has not been properly scoped. There is no clear plan for the access road, which will have a significant impact on the environment, as well as safety. This was falsely or negligently glossed over in the RDEIR and unfairly downplays the drastic effects the access road will have, both environmentally and in terms of safety.

First, the access road is not 100 feet from Scenic Hwy 1. The football field is 65 feet from Scenic Hwy 1. The access road is 18 feet across. The access road is 45 feet from Scenic Hwy 1 and directly abuts the track and football field, creating a safety hazard. What studies were performed to determine that CUSD has a right to build an access road within 45 feet of Scenic Hwy 1? What local ordinance or policy does CUSD exempt itself from? What state or federal policy is CUSD failing to adhere to? What studies were performed to ensure that the access road is safely part of the overall circulation and safety plan for CHS? What analysis was performed to ensure that this is an adequate fire or safety route or that it is compliant with laws relating to fire and safety, including emergency vehicle ingress and egress and safe travel? What analysis was performed to ensure that an “access road” is compliant with all applicable laws for road construction and safety given that it will butt-up against the track and football field? What best practices were analyzed for safety of the students during the use of the field for football, track and field, field hockey, boys and girls soccer and boys and girls lacrosse to ensure



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con't. | students using the field will be safe from vehicular traffic, particularly in the event of an accident?  
What studies were performed to ensure the safety of pedestrians using the access road to reach their cars?
- 18 | What studies were performed to analyze the cumulative effects of the stadium lights, along with the access road lights, baseball driveway road lights (if any) and the new parking lot lights as far as their effects on: 1) traffic on Scenic Hwy 1, especially when the mature trees are substantially trimmed back or more realistically removed (or die); 2) the effects on the local wildlife and plant life of so much artificial light in the area and on so many nights, as well as analysis of the impacts on wildlife if the mature trees are removed, which will likely have to be the case; 3) whether the access road, driveway and parking lot lights will have to remain on all night every night for safety purposes and how that effects the local wildlife, and plant life; 4) how the added access road and parking lot lights will affect the residents in the direct vicinity, especially if the lights on the access road and new parking lot must stay on all night, every night for safety; and 5) how far the additional and/or cumulative lights will shine? What was your analysis of the hours and days that additional lights on the access road, driveway road and new parking lots must be on for safety purposes? What is your analysis of the cumulative lights when there is substantial fog/precipitation, as often occurs in Carmel and at CHS?
- 19 | The RDEIR shows that mature trees on Scenic Hwy 1 fall directly in the path of the new access road. This is not fully disclosed. The RDEIR indicates that large limbs “may” have to be removed in order to build the access road and discusses the “hope” to save the trees. However, the RDEIR map shows that the trees are in the direct path of the new access road. The attached pictures show how large the trees are and how narrow the space is for the access road. The reality is that most, if not all the mature trees lining the access road will have to be removed or will die after their roots are paved over. The trees will have to be removed for the new parking lot where the tennis courts will be removed or will die when their roots are paved over.
- The RDEIR fails to address the environmental impacts of tree removal, including how tree removal impacts nearby houses and Scenic Hwy 1 (light, noise, changes in drainage, displacement of wildlife, change of scenery). The RDEIR does not address how tree removal, grading for the new road, the parking lot or the expanded driveway road, or the related paving impacts drainage, including on local roadways and housing. What studies have been performed to assess how drainage will be impacted? What studies have been performed to determine that these “improvements” can be adequately installed without creating water run-off and/or flooding to local residents? One resident on Morse drive has already complained about flooding from CHS. What has been done to address or mitigate the flooding or slides to her house or any other house by changes in grading and paving over local drainage channels, dirt areas and hillside areas, or cutting into the hill?
- The RDEIR does not address how tree removal impacts light, sound and safety buffers between Scenic Hwy 1 and the new access road or parking lots. What study was performed to determine the effects of increased light on Scenic Hwy 1 and surrounding houses and wildlife due to tree removal? What study was performed to address increased noise that will be heard by neighbors due to increased traffic on the access road and in the new parking lot due to the football games, other sporting events and practices, increased traffic and later use of the field, parking lots and the road, particularly with no trees to buffer the noise? What will be the difference in noise levels if new, smaller trees are planted



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where mature trees once stood, or if no new trees are planted at all? What studies were prepared to determine the effects on local wildlife, including nesting birds, bats, the local hawk that hunts in the area and the myriad of other animals that live in or near the trees or use the trees for protection or food? The alleged mitigation measure monitor birds and bats before evicting them is insufficient. It basically states that a study will be done later and fails to address the true impact of getting rid of all of the trees or how the birds and bats (no other wildlife was considered) will be affected by the need to find new homes or the impact of overcrowding in the area if not enough trees are available. What mitigation measures does the CUSD propose for the true effects that may occur from removal of the trees? What other animals will be affected, such as for lack of food or shelter?

Finally, the intrusive light and noise cannot be mitigated unless other measures are taken. What other mitigation measures have been considered? If young trees are planted, what is the analysis of how long they will take to become mature? When they reach maturity, with they have to be removed as well? Will this be an ongoing cycle? What was done to analyze the impact of tree roots on the access road if the trees are not removed and the roots break through or buckle the asphalt? What about the unsafe conditions created if this occurs, as can commonly be seen on sidewalks and driveways? Does the CUSD intend to install the lights first and determine later whether it will proceed with the other improvements, thus obtaining the lights on false pretenses of alleged "mitigation" measures that do not mitigate the problems created by the added lights, noise and traffic? It is impossible to comment when these issues were not considered, and no meaningful mitigation measures were analyzed or included in the RDEIR.

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## THE NEW PARKING LOTS

### The Parking Lot at the Tennis Court Site

The RDEIR fails to address how the removal of the tennis courts impacts the environment, safety, and traffic. The RDEIR fails to address the impact of ingress and egress to and from Morse Road from the new parking lot where the tennis courts will be ripped out. How will the many cars that park in the new lots affect traffic and safety on Morse Road, including access of residents and emergency vehicles? How does this added traffic, in conjunction with traffic from the baseball field parking lot safely get on to Scenic Hwy 1? There is no traffic signal, and it is not a right turn only intersection. What studies were performed to determine how the traffic will impact Morse Road after games and practices at CHS? How will the egress of cars after games and practices (not just football) impact traffic on Scenic Hwy 1? How far up and down Scenic Hwy 1 will the ingress and egress of affect back-up in either direction?

Of particular concern – what will the effects of traffic be on Scenic Hwy 1 when people living off in Carmel Knolls, Carmel Views, Mid-Valley, Carmel Valley, Big Sur, Mission Fields, etc. turn left on Scenic Hwy 1, particularly after football games but realistically after school, after any practice and Scenic Hwy 1 after any game? Again, there is no traffic signal, and it is not a right-turn-only situation. How will traffic be impacted when pedestrians run across Scenic Hwy 1 to access cars they parked in the neighborhood across Scenic Hwy 1 because it is too far to walk up to Ocean Avenue and cross at the light. What study was performed to determine whether it is too unsafe to walk or ride a bike on Scenic Hwy 1 because there is no sidewalk or shoulder, only a drainage ditch, particularly in the dark?

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And while this may not be an environmental impact, it does beg the question: Have the BOE trustees contemplated the effects on the community, school population and individual families when accidents occur due to unsafe left turns out of Morse Drive or a pedestrian or bicyclist gets hit running across Scenic Hwy 1 or walking down the side of Scenic Hwy 1 (either due to parking issues or the proposed mitigation measure that people should walk or ride bikes to the game)? CUSD and the BOE trustees are on notice and should already be aware that by creating this situation, to be negotiated after school and at night, the CUSD and the trustees will be personally responsible for any grievous injury or death caused to or by a student, attendee, or invitee of CHS.

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#### The Parking Lot at the Pool

The RDEIR fails to address the environmental impact or safety issues created by this new parking lot. How will attendees get to this parking lot at the back of CHS? Is it the intent that cars will drive on the portion of the road adjacent to the football field where students, team members, and fans walk, and ticket booths are illegally set up on the emergency access road? Will it be one-way traffic along the top of the school by the Performing Arts Center? What studies were performed to determine the safety of this additional traffic, particularly when busses also park in the area next to the Performing Arts Center and students load and unload in that area? What studies were conducted to determine how this will impact traffic at the end of a school day each day? Traffic already backs up onto Scenic Hwy 1 at the end of the day. All traffic flows out at Ocean Avenue. What will be the impact of additional traffic coming from behind the Performing Arts Center? How will traffic flow with the busses loading and unloading in that area? What did you do to study these impacts? What circulation and safety studies were performed to determine if the new parking lot could be safely entered and exited daily for school, practices and games? Is there appropriate fire and/or emergency exit and vehicle access? If so, how did you make this determination? If not, what mitigation measures do you plan? Since no mitigation measures are in the RDEIR and this issue is ignored, it is impossible to consider or comment on any mitigation measures.

What analysis was performed as to the cumulative effects of additional parking lots in conjunction with the new access road and the expanded driveway? It would appear that this was not studied, and no mitigation measures were considered, making it impossible to fully analyze and comment.

In addition to the above, what will be the impact of ingress to and egress from the access road on the campus end of the road? The access road will enter the CHS parking lot at the entrance to CHS from Scenic Hwy 1. What studies have been performed to determine how cars will safely enter CHS from Scenic Hwy 1 and the access road at the same time? What studies have been performed to determine how much traffic entering CHS from the access road will impact traffic on Scenic Hwy 1? It will undoubtedly create additional back-up down Scenic Hwy 1 of cars seeking to enter CHS, possibly blocking the turn onto Morse Road. What has been done to analyze this issue? What has been done to analyze traffic leaving the main CHS parking lot by way of the access road, including the effect on traffic entering CHS? Will there be a change in traffic circulation patterns and allowed direction of travel? Has this been assessed in any manner so that the effects of this new road are properly analyzed for environmental concerns, including additional traffic, as well as safety? It is impossible to comment on this when no analysis was performed, and no meaningful mitigation measures were included in the RDEIR.

22 NUMBER OF ATTENDEES

There is no valid methodology or basis for establishing anticipated attendees for games, practices, and events (football, soccer, field hockey, lacrosse, track meets, swim meets, water polo games, basketball, volleyball, band practice, dance, and theater rehearsals to name a few) or how they are impacted by multiple events/uses at one time. The RDEIR fails to provide a valid basis for the number of vehicles that will be going to and from CHS on a regular basis, pretending this will only happen 5-6 nights per year. It is impossible to comment on this when no analysis was performed, and no meaningful mitigation measures were included in the RDEIR.

23 TRANSPORTATION

The RDEIR plan for managing vehicle traffic during games, relying heavily on voluntary measures that are unlikely to succeed, and compliance by visitors unfamiliar with the plan goals is untenable and based on a false hope that any of these measures will work, let alone all of them.

The RDEIR only addresses football games and proposes that visitors should get all CHS parking and home-town fans should park at Carmel Middle School (“CMS”) and take shuttles. The RDEIR states that all CHS students will be required to move their cars to CMS. The RDEIR does not adequately address the environmental impact of requiring all cars to move from CHS to CMS or how that will be effectuated or maintained.

Per the RDEIR, all home-town fans should park at CMS and shuttle. This is not a requirement. What is the environmental impact of busses continually driving between CMS and CHS? Will there be shuttles for JV games? Will they be ongoing throughout the games? What happens if an attendee has an emergency or needs/wants to leave early? Will they be able to get a shuttle? CUSD has previously stated that there is a bus driver shortage and that drivers cannot be asked to work late to shuttle players to or from MPC or PGHS during football season. How is it that CUSD will be able to get multiple school bus drivers to shuttle fans between CHS and CMS on game nights? What happens if there is not a sufficient number of drivers on any given game night? The RDEIR fails to fully address congestion or the environmental impact of busses continually driving from CMS to CHS and back, or whether attendees will even take the shuttles. The RDEIR fails to address safety, congestion, or environmental impact issues that will arise if CHS students or fans refuse to park at CMS and park at or near CHS instead, including in the neighborhoods adjacent to CHS and across Scenic Hwy 1.

It is impossible to comment on this when these issues were not analyzed no meaningful mitigation measures were included in the RDEIR. However, it appears that requiring all CHS students to move their cars and having a constant rotation of school busses shuttling between CHS and CMS between approximately 4:00 pm and 10:30 pm (or later depending on fan exodus) each Friday night will have significant environmental impacts that have not been addressed.

24 SAFETY

The RDEIR fails to address adequate safety precautions at CMS for shuttling. The RDEIR fails to address adequate safety precautions for the added roads at CHS (the 18-foot access road and the road to the baseball field) or the new parking lots. The RDEIR fails to address adequate safety precautions for the substantial new ingress and egress to/from the new parking lot on Morse Road.

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The RDEIR claims that Friday night football promotes safety and school spirit, without providing any basis for this conclusory statement. The RDEIR fails to address how the Improvements Project promotes safety to teen/provisional drivers living in Carmel Valley, Cachagua and Big Sur driving home after late games and practices. The RDEIR fails to state or even address why school spirit is an overriding consideration for the light, noise, traffic, safety issues and harm to wildlife and plants.

Furthermore, the RDEIR fails to even consider whether any of the student body, their families or the community at large think that Saturday games promote school spirit and spirit in the community. There are bold statements that the students have a “right” to Friday night football. What this “right” is based on is unclear. The RDEIR ignores the fact that currently, the students get to experience Friday night football for half of the season and experience day games, similar to the college experience and many professional games, for half of the season. What analysis was done, at all, to determine whether there is a benefit to this type of dual experience, or whether any portion of the student body or their parents, other family members or other community members who come to CHS day games to support the team prefer this dual system or day games?

Was any consideration given to the weather conditions at CHS for night games? The RDEIR boldly proclaims that night games will be a bigger draw for attendees, with no real basis for this proclamation. Has anyone considered how cold, wet, and windy the stadium will be at night? Will this impact attendance? It would seem that older attendees who enjoy the games, whether due to grandchildren or simply because they enjoy football and support the community, as well as persons with small children will avoid night games if they are required to sit through cold, wet and windy nights. Perhaps some of the students will choose to stay home as well, who are more indifferent to football. Was any analysis performed regarding these issues? Especially in conjunction with the inconvenience of shuttling to CHS from CMS and getting home very late after games (especially those in Carmel Valley, Cachagua and Big Sur). Was any analysis done to determine if you are alienating various segment(s) of the population that come to and enjoy day games? Given the public shaming, humiliation and vilification of persons opposed to the Improvements Project or the stadium lights in general, it would seem that persons alienated by the Improvements Project and Friday night football would be hesitant to speak up, particularly if they are from underrepresented classes who do not usually stand up to authority figures. What a sad situation you may have created with your tunnel vision desire to install lights.

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#### LIGHTS (Direct Effects of the Lights)

The lights will cause substantial light to be cast onto Scenic Hwy 1 and are within 500 feet of homes. The RDEIR fails to address whether the constant bright lights shining onto Scenic Hwy 1 will impact driver visibility at night, particularly given the cumulative effects of access road and parking lot lights. This will be exacerbated if the trees are removed or replaced with immature trees. What studies were performed regarding this issue? Was this analyzed at all? How did you determine whether it will be safe for drivers to drive from the dark into the light extreme light? Was the effect of glare analyzed?

The lights will create a “light dome” on the many foggy nights that occur in Carmel, which the RDEIR ignores. This common phenomenon in the Carmel area will severely diminish the clear night skies enjoyed by many who travel on protected Scenic Hwy 1, and not just for 5-6 football games per year.

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This common phenomenon will also add to the cumulative impacts of the CHS lights on the road, particularly if mature trees are removed to construct the 18-foot access road adjacent to Scenic Hwy 1.

The lights are not/will not be mitigated by tall trees. Several mature pine, cypress, and oak trees along Scenic Hwy 1 and within the new designated parking lots will be substantially cut or removed entirely, causing greater visibility and glare. Even if the trees are not initially removed, paving over their root systems, and removing large limbs will result in disease or death, requiring removal. Yet no mitigation measures were considered to address that added lights on Scenic Hwy 1, making it impossible to comment about such mitigation measures, if any exist.

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The RDEIR admits that the lights will have a “*significant and unavoidable impact*”, despite failing to address so many of the issues and cumulative effects of the lights. The RDEIR fails to conduct a Cost-Benefit Analysis (per the initial Draft EIR) to inform a required Statement of Overriding Considerations. Does CUSD and the BOE trustees believe that “school spirit” is an overriding concern to the environmental and safety issues that will be created?

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#### CONCLUSION

The RDEIR fails on many levels. It fails to adequately address several environmental and safety issues related to traffic, parking and the effects of the lights on protected Scenic Hwy 1. It is biased in favor of CUSD’s desire to add lights, thus failing to address environmental and safety impacts created by the “improvements” proposed in the RDEIR.

The RDEIR should be tossed out and a new study performed to address the *actual* environmental and safety impacts created by the Improvements Project. Consideration of a stadium at CMS should be considered, with a concerted effort made toward how a stadium could be installed in a manner that would impact as few residents as possible – looking at realistic mitigation measures for the real problems you are creating. Alternatively, you could leave CHS the way it is, except that you should fix the pool lights as previously promised. Hijacking the pool lights to get the stadium lights is “dirty pool” and unbecoming of CUSD, since you created the problem and failed to follow CEQA when installing the pool lights in the first place.

Very truly yours,

Scarborough Law

  
Tiffany P. Scarborough, Esq.

Encl.

cc: BOE trustees









## Response to Letter 185a, Tiffany Scarborough, Esq

1. The commenter indicates she represents Save Carmel, a local organization of concerned Carmel residents. CPRA requests and responses are not the subject of the RDEIR, and are outside the scope of the CEQA process. This comment does not raise an environmental issue and therefore, no response is necessary.
2. This comment is regarding the expansion of the project description, new scoping process, purpose of the lights for only 5-6 football games, and notification of the community about the expanded scope of the project. Regarding the expanded scope of the project, scoping, and communication with the community, see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, response to Letter 14-1-u, comment 1, and response to Letter 2c, comment 3. The school district has complied with all of the noticing requirements of CEQA. See also response to Letter 14-3-m, comment 1. Regarding the purpose of the stadium lights, see Section 4.0, Project Description, regarding what sports teams would practice and play under the lights. It's not clear why the commenter states that the purpose for the lights is only 5-6 football games. No changes to the RDEIR are necessary.
3. This comment is regarding safety and congestion impacts on State Route 1, ingress and egress to parking lots, the safety of the 18-foot access road, removal of trees, lack of a vehicular access and circulation study, appropriate fire and safety routes, building “concepts” and impacts on local wildlife and fragile ecosystems. See also response to Letter 14-2-f.

Traffic and traffic safety, ingress and egress to parking lots, and vehicular access and circulation are addressed in Section 11.0, Transportation and Parking and in Appendix B (Neighborhood Parking Assessment), Appendix J (VMT Assessment and Intersection Operations, Site Access and Parking Evaluation), and Appendix K (Traffic Management Plan). See also response to Letter 2b, comment 3 and Letter 14-1-k.

Potential tree removal and impacts on local wildlife and fragile ecosystems is addressed in Section 7.0, Biological Resources of the RDEIR. As stated in the RDEIR, no trees are planned for removal as part of the project.

Regarding safety of the 18-foot access road, the commenter provides no evidence that the proposed access road would be unsafe. For further analysis of on-site circulation and safety, please refer to Section 11.0, Transportation and Parking, of the RDEIR, and Figure 4-1, Overall Site Plan, and Figure 4-6, Post Development Overall Parking Exhibit, of the RDEIR, as well as the revised Figure 4-10, Tennis Court Parking Lot – Conceptual Design, included in Section 3.0, Changes to the Revised Draft EIR, of this final EIR.

Regarding building “concepts,” the details of the storage building and viewing platform was in sufficient detail to perform an adequate environmental evaluation of its impacts. Please refer to Section 4.0, Project Description, of the RDEIR for project details. No changes to the RDEIR are necessary.

4. This comment makes general statements about the RDEIR, but does not raise any environmental issues. The comment alleges that “widespread impacts of implementation” are missing from the analysis in the RDEIR, but does not identify which alleged impacts are missing. The comment likewise does not identify which mitigation measures are alleged to be inadequate. Including technical reports and studies relied on by an EIR in an appendix to the RDEIR is proper under CEQA. Therefore, no response is necessary.
5. Comment noted. Regarding use of the stadium when lights would be used and the purpose of the stadium lights, see Section 4.0, Project Description, regarding what sports teams would practice and play under the lights, and how often, as well as the limitation for use of the lights. See also response to letter 2b, comment 2.

Regarding the pool lights, these lights are existing. The proposed project includes retrofitting them to reduce the lighting impact. See discussion under Section 5.0, Aesthetics, of the RDEIR.

6. The cumulative impacts of the pool lights and the stadium lights, as well as the parking lot lights being on at the same time is addressed in Section 5.0, Aesthetics, of the RDEIR, as well as in Section 4.0, Project Description, and Appendix C, Lighting Data. See also Mitigation Measures 5-2a through 5-2d for required limitation on the use of the lighted field. The RDEIR concluded that even with implementation of these mitigation measures, the lighting impacts would be significant and unavoidable. No changes to the RDEIR are necessary.
7. The commenter expresses concerns with the adequacy of the transportation study, but does not identify where it is inadequate. See Section 11.0, Transportation and Parking and in Appendix B (Neighborhood Parking Assessment), Appendix J (VMT Assessment and Intersection Operations, Site Access and Parking Evaluation), and Appendix K (Traffic Management Plan), regarding traffic impacts, include circulation and access. No changes to the RDEIR are required.
8. The Traffic Management Plan will only be needed during the highly-attended events (or on-campus events that may occur at the same time); it will not be necessary for practices and events which do not draw a high attendance. Please see Section 11.0, Transportation and Parking, of the RDEIR. The project also includes 111 additional on-campus parking spaces. Please see Section 4.0, Project Description, of the RDEIR. No changes to the RDEIR are required.

9. See response to 8 above.
10. The school district does not consider practice an “event.” It is acknowledged that various team practices may be occurring throughout campus concurrently with an “event.” Again, it’s not clear why the commenter thinks the RDEIR only addresses 5-6 football games per year and ignores all other sports. The commenter provides no source for this false assertion. In general, please see discussion at Section 3.0, Environmental Setting, Section 4.0, Project Description, and throughout the RDEIR, including, without limitation, in Section 11.0, Transportation & Parking.
11. Regarding the methodology used in the vehicle miles traveled study, see Section 11.0, Transportation and Parking of the RDEIR. See also response to Letter 14-3-a.
12. See response to 11 above.
13. Regarding the methodology used to estimate 3.24 persons per vehicle, see Section 11.0, Transportation and Parking, of the RDEIR. See also response to Letter 2c, comment 14. For clarification, Archbishop Mitty High School is a private high school and the commenter assumes that all students live within minutes of the school; however, she provides no evidence for this assertion.
14. This comment asserts that the transportation report prepared for the proposed project fails to analyze the true traffic impacts. The proposed project’s traffic impacts were evaluated by a professional transportation firm using the CEQA Guidelines, the *Technical Advisory On Evaluating Transportation Impacts in CEQA* ([https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)), and standard professional transportation engineering practices. No additional traffic or transportation analysis is required.
15. This comment is regarding high school parking in the neighborhoods, which is an existing condition, and is not illegal. With the proposed project, parking in the neighborhoods could increase if attendance at campus events increase. Note that it would still not be illegal. Parking in the neighborhoods is not an environmental issue; however, the proposed project includes an additional 111 on-campus parking spaces to address concerns raised by the neighbors. See response to Letter 11b, comment 16. CEQA does require the construction of these new parking spaces to be evaluated for their environmental impacts, and the RDEIR addresses those impacts throughout the RDEIR. However, even with the addition of 111 on-campus parking spaces, there would still not be enough on-campus parking to accommodate all spectators at highly-attended events. Implementation of the Traffic Management Plan is detailed in Section 11.0, Transportation and Parking, and in Appendix K of the RDEIR. The no parking signs are only one component of the plan. Although it is acknowledged that the school district has no authority to require Monterey County to grant

encroachment permits to temporarily put up no event parking signs, there is no indication that approval of the necessary encroachment permit from Monterey County would not be granted based on past encroachment permit approvals granted by the County. The Traffic Management Plan mitigation measure proposed by the school district, is feasible, will reduce issues associated with parking in the neighborhood, and is fully enforceable when adopted by the school board. See also responses to Letter 14-1-m and Letter 14-1-q, comment 2. No additional analysis is required and no changes to the RDEIR are necessary.

16. This comment is about a new driveway to the baseball field; however, the proposed project does not include a new driveway to the baseball field. Please refer to Section 4.0, Project Description, of the RDEIR. The commenter provides no source for this information. No changes to the RDEIR are required.
17. This comment is about the proposed new 18-foot access road. For clarification the proposed access road is not 18 feet, but 18-feet wide. The road, circulation improvements, and parking lots, were designed by a civil engineer, as identified on the relevant figures in Section 4.0. The plans for the road, and parking lots, are presented in Section 4.0, Project Description, of the RDEIR and sufficient information was included regarding their location and design to adequately evaluate the environmental impacts. Regarding the school district's right to building a parking lot and access road on property owned by the school district, it's not clear why the commenter believes the school district cannot construct these improvements on their own property. Regarding exemption from local policies and ordinances, see response to Letter 2b, comment 4, and Letter 11b, comment 16. Regarding safety issues, see response to Letter 14-2-f and Letter 14-1-k. No changes to the RDEIR are required.
18. This comment is about cumulative lighting impacts on State Route 1, the neighbors, and on wildlife. Lighting impacts from public viewing places are addressed in Section 5.0, Aesthetics, of the RDEIR; see also response to Letter 2b, comment 1. Lighting impacts on individual residences are not required to be evaluated in CEQA. See response to Letter 103a. Lighting impact on wildlife are addressed in Section 7.0, Biological Resources; see also response to Letter 2b, comment 1; Letter 72b; Letter 72f; Letter 131; Letter 132b; and Letter 157. Finally, the proposed project does not include keeping the lights on all night, every night. No changes to the RDEIR are required.
19. Regarding tree removal, see Section 7.0, Biological Resources of the RDEIR, as well as responses to Letter 14-2-p; Letter 15a; and Letter 28a, comment 9. No changes to the RDEIR are required.

Regarding drainage impacts, see Section 12.0, Soils, Erosion, and Water Quality of the RDEIR, as well as responses to Letter 14-1-w; and Letter 14-6-h. Regarding flooding, see

response to 14-1-w; and Letter 21c, comment 3. The proposed project would not result in significant erosion impact or off-campus flooding. See Section 12.0 for further discussion. No changes to the RDEIR are required.

Regarding tree removal and lighting impacts, tree removal is not planned as part of the project. See Section 7.0, Biological Resources of the RDEIR and response to Letter 2b, comment 2. Regarding lighting impacts, see response to 6 above. Lighting impacts were determined to be significant and unavoidable. The unplanned removal or death of trees are mitigated by the measures in Section 7.0; however, the lighting impacts would still remain significant and unavoidable.

Regarding noise level increases if trees die or are removed, vegetation provides no measurable noise mitigation. See response to Letter 2b, comment 3 and Letter 58b, comment 14.

Regarding impacts to wildlife and identified mitigation measures, see Section 7.0, Biological Resources of the RDEIR, as well as response to Letter 131 from the California Department of Wildlife. No changes to the RDEIR are required.

20. This comment is regarding the proposed new parking lot at the tennis court site. The commenter asks several questions, but does not comment on the relevant analysis in the RDEIR. Regarding impacts on the environment, the proposed new parking lot is part of the project description, the entirety of which was evaluated in the RDEIR. Regarding the traffic impacts associated with cars parking in the new parking lot, Refer to Section 11.0, Transportation and Parking, of the RDEIR. Hexagon Transportation Consultants (RDEIR Appendix J) reviewed the vicinity and on-campus access and circulation and concluded that with implementation of the Traffic Management Plan, traffic operations would work acceptably. Any perceived safety impacts would be mitigated by implementation of the Traffic Management Plan. Refer to Section 11.0, Transportation and Parking, of the RDEIR for further discussion, including Mitigation Measure 11-4 regarding the Traffic Management Plan. See also response to 14-1-g, comment 7 and Letter 14-4-u. Regarding jaywalking on State Route 1, this comment does not raise an environmental issue and therefore, no response is required. No changes to the RDEIR are required.
21. This comment is regarding the proposed parking lot east of the existing pool. The commenter asks several questions, but does not comment on the relevant analysis in the RDEIR. See response to comment 20 above. No changes to the RDEIR are required.
22. This comment is regarding attendees to games, practices, and events, many of which are not associated with the proposed project. See response to Letter 5, comment 6; and Letter 14-4-m. Regarding identifying the number of vehicles that will be going to and from the high



school on a regular basis, the RDEIR is only required to evaluate potential environmental impacts of traffic associated with the proposed project, not with existing conditions.

Regarding “pretending this will only happen 5-6 nights per year,” see responses to 2 and 10 above.

23. This comment is regarding the Traffic Management Plan. See response to comments 3 and 8 above. Additionally, the RDEIR does not state that high school students will be required to move their cars to the middle school. Regarding the bus drivers, hiring bus drivers two to three times per year associated with implementing the Traffic Management Plan would be feasible. The impacts of the shuttle buses are addressed in the RDEIR. See sections 6.0, Air Quality (beginning on page 6-19); 10.0, Noise (beginning on page 10-10); and 11.0, Transportation and Parking (beginning on page 11-10).
24. This comment is about safety. Regarding safety impacts associated with shuttling back and forth to the middle school, the commenter doesn’t indicate a specific concern. There is no safety impact associated with the shuttle that would result in an environmental impact. No further response is necessary.

Regarding safety issues associated with ingress and egress and internal circulation at the high school, see response to 3, 17, and 20 above. No changes to the RDEIR are necessary.

Regarding Friday night football promoting safety and school spirit, and safety to drivers living in Carmel Valley, Cachagua and Big Sur, this comment does not raise an environmental issue and therefore, no response is necessary.

Regarding overriding considerations, the school board is required to adopt a statement of overriding considerations for impacts that are significant and unavoidable. The RDEIR concludes that the only significant and unavoidable impact is associated with lighting. All other significant environmental impacts addressed in the RDEIR can be reduced to a less-than-significant level with the implementation of identified mitigation measures, some of which are modified to address public comments in the final EIR. See Section 3.0, Revisions to the Revised Draft EIR, in this final EIR.

The commenter also falsely asserts that “there are bold statements that the students have a “right” to Friday night football.” There is no such statement in the RDEIR.

Regarding Friday night games versus Saturday day games and school spirit, this comment does not raise an environmental issue and therefore, no response is required. Please also see response to Letter 13b2, comment 8.

Regarding weather conditions at the high school, this comment does not raise an environmental issue and therefore, no response is required.

With respect to alleged social impacts, please see response to Letter 14-2-d.

25. This comment is about the direct effects of lights. Regarding lighting impacts to State Route 1, refer to Section 4.0, Project Description, response to Letter 2c, comment 19, and the lighting analysis in Section 5.0, Aesthetics, of the RDEIR. Although the lights will be visible from the highway, the lights will not shine on the highway. No changes to the RDEIR are necessary.

Regarding the “light dome” see response to Letter 2b, comment 2. Regarding tall trees mitigating lighting impacts, the RDEIR does not make this assertion. Regarding tree removal, see response to comments 3 and 19 above. No changes to the RDEIR are necessary.

26. Regarding a cost-benefit analysis and statement of overriding considerations, see response to Letter 2b, comment 2.

27. This comment summarizes some of the previously stated issues, but also raises: the alternative of constructing a lighted stadium at the middle school, and fixing the pool lights. Section 18.0, Alternatives, addresses an alternative of constructing the lighted stadium at the middle school. Regarding fixing the pool lights, the proposed project includes retrofitting the pool lights to reduce their impact. See Project Description at Section 4.0 of the RDEIR. No changes to the RDEIR are required.

# SCARBOROUGH LAW

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October 10, 2022

**Sent via Email Only**

Carmel Unified School District  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road  
Carmel, CA 93923  
feedback@carmelunified.org

**Re: Carmel High School Stadium Improvements, Carmel, California**

Dear Mr. Paul and Carmel Unified School District Board of Education Trustees,

1 | This office represents Save Carmel, a local organization of concerned Carmel residents. I submit the following comments to the Revised Draft Environmental Impact Report (“RDEIR”) on behalf of Save Carmel, which includes numerous group members, some of which have been improperly called out and vilified in the media, on social media, and in BOE meetings by Carmel Unified School District (“CUSD”) representatives for their engagement in the CEQA and CPRA process, which is their *right*.

2 | Save Carmel is worried about the effects of the Carmel High School Stadium Improvements Project (“Improvements Project”) on the local environment, as well as safety. Traffic and parking issues were addressed under separate cover. This letter shall focus on the environmental concerns, many of which are hidden in the RDEIR, which is incomplete, intentionally vague, and misleading. The true impacts are glossed over or ignored. The RDEIR focuses heavily on temporary impacts, such as construction work, instead of fully exploring the widespread impacts of its implementation. Much of the pertinent information is buried in appendices, making it difficult to find specific information that is only superficially addressed in the actual report.

Most of the alleged “mitigation” measures in the RDEIR are temporary or at the pleasure of the CUSD, to be changed at the Board’s discretion and leisure. Numerous items are to be “figured out” as the Improvements Project progresses, with no real roadmap or budget for moving forward in a thoughtful and environmentally or safety conscious manner.

3 | CUSD has misled the Carmel community with the idea that the stadium lights will only affect the community 5-6 times per year with Friday night football games, burying the true usage of almost nightly lights and use of the football field into the evenings, increased noise, increased traffic, destruction of the dark skies such that residents and visitors will no longer be able to enjoy sunsets,

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watch the sky turn from blue to pink and orange, to dark blue and then black, or see the stars at night. The BOE trustees and the superintendent intent to change the beauty of the Carmel night sky and ruin the natural beauty enjoyed by so many, under false pretenses of 5-6 nights per year, and without fully evaluating the environment, safety or societal impacts of their decision to proceed with the “improvements”.

Below are key concerns based on a thorough review of the RDEIR, regarding the failings of the RDEIR and the far-reaching environmental effects and safety issues resulting from the so-called “improvements”. The Improvements Project will negatively impact the community, including residents, visitors, local wild and marine life and may disrupt sensitive ecosystems.

4

#### LIGHTS (Direct Effects of the Lights)

The lights will cause irreparable harm, including light pollution, harm to the environment, create a “light dome” on foggy nights (a common occurrence), will impact local species and will be an eye-sore standing above the local terrain.

- Stadium Lights: 400 practices (multiple sports) per year and up to 124 games per year (football, field hockey, boys and girls soccer, boys and girls lacrosse, track and field. This only accounts for CHS sports teams. It does not account for band practice or any community use. This *IS NOT* 5-6 nights per year but impacts the Carmel community year-round.
- Pool Lights: 150-180 night practices and 28-31 night games/meets per year (boys and girls swim meets and water polo games). This only accounts for CHS swim and water polo teams and no other community use. This will impact the Carmel community approximately 6 months of the year.

There was no analysis or discussion of the cumulative impacts of the stadium lights and the pool lights, which will be on *at the same time* many nights during the year. There is no consideration for the additional lights that will be added to the new parking lots where the tennis courts will be ripped out and behind the pool, or lights added to the new access road or expanded driveway road to the baseball field. There is no discussion of the environmental impacts or mitigation measures, if there can be any, for the simultaneous use and cumulative effects of the various lights.

The RDEIR fails to address and completely ignores the “light dome” created by the lights on foggy nights, which are a common occurrence in Carmel. The light dome created by the lights will severely diminish or completely block the sunsets and clear night skies enjoyed by many, the majority of nights during the year (not 5-6 football games per year). The light dome will add to the cumulative impacts of the CHS lights on the surrounding area, particularly when both the stadium lights and pool lights are on at the same time. These impacts include, but are not limited to, the inability to see sunsets and the night sky, impacting the Coastal Zone, will ruin the view of residents and park users in Carmel, Carmel Valley, Pebble Beach, Big Sur and Jack’s Peak, Point Lobos, at the lagoon and local beaches. (See attached RDEIR Figure 5-2). Why wasn’t this common phenomenon considered or analyzed in any way? There are no mitigation measures to address the light dome problem because it cannot be mitigated, except by not having lights.

5 The RDEIR downplays or ignores the effects of the constant bright lights on local and migratory birds, bats, insects, butterflies, and other creatures, such as red-legged frogs, as well as native plants, and marine life that will be subjected to these lights all year long. CHS is adjacent to Hatton Canyon Park. Animals and plants will be subject to artificial light nearly every night of the year. Potential effects on wildlife, plants and fragile ecosystems are particularly concerning given that many of the surrounding trees will be trimmed back or removed to make way for parking lots and an 18-foot access road, and the hill will be cut into to widen the road into the baseball field. Why wasn't the impact of constant bright lights on the local wildlife analyzed, other than minimal effort to consider when the nearby trees are "trimmed"?

What is the effect of having the stadium lights on nearly every night of the year, and at times in conjunction with the pool lights, as well as added road and parking lot lights, on nearby animals that typically nest/burrow and sleep at night when the lights are on every night? What is the effect on nocturnal animals, such as owls and bats when it is light an extra 2-4 hours or more per night? What is the effect on plants that require darkness or are overexposed to the constant bright lights? None of this was analyzed due to the unduly narrow assessment of football games only, although football games are but a small fraction of the proposed use. It is impossible to comment on environmental effects and mitigation that were never considered or mentioned.

6 The RDEIR fails to address and ignores the environmental impact of additional lights to be added to two new parking lots, storage building with viewing deck, access road, and expanded driveway road. The lights are within 500 feet of homes. The lights are not mitigated by tall trees. Several mature pine, cypress, and oak trees along Scenic Hwy 1 and within the new designated parking lots will be substantially cut back or removed entirely, causing greater visibility and glare. Even if the trees are not initially removed, paving over their root systems, and removing large limbs will result in disease or death, requiring removal. This was not considered in the RDEIR. Why not? Given that the trees will have to be removed for the access road it is inexcusable that the DREIR ignores the environmental impacts when the trees are removed or how the environment and community are affected.

The RDEIR admits that the lights will have a "*significant and unavoidable impact*". The RDEIR fails to conduct a Cost-Benefit Analysis (per the initial Draft EIR) to inform a required Statement of Overriding Considerations.

7 LIGHTS (Effects on Viewshed)

The RDEIR analysis of the geographic area affected by the lights is limited to 3.5 miles around CHS, which is an arbitrary and strategic boundary limitation. The true impact of the lights covers a much wider geographic area, including from Carmel-by-the-Sea, Carmel Knolls, Carmel Views, Carmel Valley, High Meadows, Mission Fields, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails, and Santa Lucia Preserve. (See RDEIR Figure 5-2, attached.) Views from public areas, as well as *numerous private residences* will be forever impacted if not ruined. The impact will be from the ugly poles and physical light structures during the day, as well as the glaring, bright lights every night. These will impact views of the mountains, hills, Point Lobos, and the ocean. Was this even considered? This cannot be mitigated.

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Carmel Area Parks affected by the Improvements Project include Hatton Canyon, Carmel River Lagoon and Wetland Natural Preserve, Ohlone Coastal Cultural Preserve, Carmel River State Beach, Palo Corona Regional Park, Point Lobos State Natural Reserve (and Point Lobos SNR, Underwater Park Area), and Point Lobos Ranch. The lights will shine out over the lagoon and ocean. The RDEIR fails to consider the impacts of the lights on any of these parks or at local beaches, on wildlife or marine life. The lights will trespass onto and throughout the Coastal Zone, which begins approximately 100 feet away from the Carmel High School stadium. Why were none of these environmental impacts studied or analyzed, let alone acknowledged? How will user experience at local parks, beaches and the lagoon be impacted when users are unable to see the beautiful sunsets or night skies due to the blazing lights and/or light domes created by the stadium lights, pool lights, parking lot and street lights added at CHS, the cumulative impacts of which were *never addressed* in the RDEIR?

The RDEIR visual simulations are flawed to downplay the effects of the lights. The RDEIR includes photos taken from fewer than 10 "Known Observation Points" ("KOP"). The photographs and simulations were taken in a way intended to obscure and downplay the effects of the lights, including:

- Angles that do not show the full impact of the lights.
- Pictures that are out of focus and/or taken behind objects and landforms.
- Pictures taken in cloudy or foggy conditions to obscure visibility (while the RDEIR simultaneously ignores the light dome that will be created by the fog)
- Failure to include simulations of additional parking lot and access road lights.
- Failure to show the true impact of the light poles and light structures on actual views.
- Failure to show the true impact of the lights on Scenic Hwy 1 after substantial tree removal, despite the fact that the RDEIR map shows trees are in the way. (What about glare? What about driving from dark into extreme light?)
- Refusal to consider visual impacts on private residences or businesses.

The horrible KOP pictures were not a mistake. These are clearly intended to mislead the public. The RDEIR is long, and the most important information is buried in the appendices. It is obvious that EMC Planning Group, Inc. is either incapable of preparing a usable draft EIR, after having had 2 chances, or is following the direction of CUSD to obscure important facts. Regardless, the RDEIR is misleading at best and fraudulent at worst. Why does CUSD attempt to hide the true impacts of the RDEIR if you stand behind the Improvements Project? Why the need to mislead or defraud the public? What local ordinances is CUSD exempting itself from by installing the stadium lights? What state or federal laws or building regulations is CUSD following or failing to follow, with the installation of the bright lights that will forever ruin Carmel's unique dark skies and beautiful night skies?

Again, the RDEIR admits that the lights will have a "*significant and unavoidable impact*", even in its manipulated state. The RDEIR fails to conduct a Cost-Benefit Analysis (per the initial Draft EIR) to inform a required Statement of Overriding Considerations. Does CUSD take the position that "school spirit" or the alleged "right" to Friday night football is a sufficient basis to permanently wreck the view for so many residents and visitors? To ruin the gem that is Carmel? To permanently deprive so many of their views of beautiful sunsets, changes to the sky when the sun goes down, or to see the stars at night? To override Carmel-by-the-Sea's no lights policy when the light will impact so many residents of Carmel-by-the-Sea? The BOE trustees knows it will ruin Carmel's unique atmosphere and beauty



7 | and will be personally responsible for the extreme detriment caused to the community at large in the  
con't. | name of "Friday Night Lights".

8 | NOISE

The RDEIR fails to adequately address or to quantify the increase in sustained noise levels during sporting events and practices *nearly every night of the year*. The RDEIR fails to properly analyze the Monterey County noise ordinance, or the manner in which the nightly use of the lights will impact allowable noise levels, both outside and inside, or whether it is exempting itself from the noise ordinance. Does CUSD have the right to create a noise nuisance every night in the name of Friday Night Lights or "school spirit"?

The RDEIR claims that the stadium's higher elevation than the adjacent neighborhood is "providing topographic acoustic shielding from some of the noise sources". This is false. What facts or science is this false proclamation based on? Noise travels and can be heard well beyond the neighborhood directly adjacent to CHS. Was this studied? Was the way noise carries in the wind or how wind patterns will affect noise travel from CHS considered or studied? How will the increased and constant evening noise impact evenings/nights for residents? Will it be a nuisance for those trying to enjoy dinner together as a family, taking evening walks, enjoying their back yards/decks/patios, doing homework, working from home, eating at local restaurants, enjoying a production at the outdoor Forest Theater, etc.? No mitigation measures were considered to address the impact of nightly noise due to games, practices, meets, matches and band practices at the CHS field each night. Or the additional noise from increased nightly traffic. It is impossible to consider and comment when no mitigation was considered.

The RDEIR fails to address how constant noise will affect local wildlife. What is the effect on nearby animals that typically nest/burrow and sleep at night when the lights are on every night that will result in increased nightly noise? What is the effect on nocturnal animals, such as owls and bats when it is light an extra 2-4 hours per night and the additional noise that comes with it? None of this was analyzed due to the unduly narrow assessment of football games only. It is impossible to comment on environmental effects and mitigation that were never considered. Instead, the RDEIR improperly focused on temporary noise from construction, minimized existing traffic noise and making unsubstantiated declarations regarding noise levels and effects with no factual or scientific basis for said declarations. Comparison to a school in Visalia with a different topography and a different stadium set-up, with no analysis whatsoever, fails. There is no factual or scientific analysis or study to determine how the two schools are similar or can be compared to one another, because they are not analogous and cannot be compared.

The RDEIR fails to address how the nightly noise will affect local businesses, such as restaurants with outdoor dining, outdoor music, and outdoor theater productions.

The RDEIR fails to identify any mitigation measures for noise. Before any decision can be made whether to implement the Improvements Project, it is necessary to perform a noise study, determine how far the noise travels, what decibel levels are reached outside, what decibel levels are reached in nearby houses, what is the cumulative effect of noise from the stadium as well as increased noise after the games and the noise from increased traffic at later hours in the evening. A study on the effects of

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con't. noise on wildlife, plant life and fragile ecosystems affected by the increased nightly noise is also necessary. Only when these appropriate noise studies have been performed can mitigation measures be considered. The RDEIR fails completely.

9 TRAFFIC, PARKNG AND SAFETY  
(This was addressed more fully under separate cover.)

The RDEIR fails to adequately analyze the impact of additional traffic due to increased use of the stadium, lacks an adequate traffic study, including a Vehicular Access and Circulation Study, and omits any emergency access routes for campus activities. The RDEIR minimizes the effect of traffic on protected Scenic Hwy 1, averaging the additional Friday football traffic over 5 days of the week. It relies on an artificially high number of vehicle occupants. It fails to address daily increased traffic of other sport and/or events at CHS and ignores when multiple practices, games and/or events will occur on the same day at CHS.

The proposed Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". Execution of proposed TMP requires an "Encroachment Permit" granted by Monterey County, for which there is no guarantee, particularly given the amount to use *actually* contemplated, not just 5-6 football games per year. There is no valid methodology or basis for establishing anticipated attendees for any of the games and events (football, soccer, field hockey, lacrosse, track meets, swim meets, water polo games, basketball, volleyball, band practice, dance, and theater rehearsals) or how they are impacted by multiple events/uses at one time. The RDEIR artificially minimizes the impact on traffic on Scenic Hwy 1. The RDEIR fails to address the impact of lights and tree removal on protected Scenic Hwy 1. The TMP encourages walking and biking to games to reduce the parking demand, while acknowledging that "[t]here are no sidewalks or bike lanes along SR" (i.e., busy Scenic Hwy 1) and fails to account for inadequate lighting and safety measures at night, which could lead to severe injury or death.

The RDEIR fails to address environmental impacts and safety issues associated with the new parking lots, 18-foot wide access road and new "driveway" road to the baseball field. The RDEIR fails to address how the removal of the tennis courts impacts the environment, safety, and traffic (sound and light buffer, animal habitats and fragile ecosystems, drainage, and run-off issues). The RDEIR fails to address the impact of ingress and egress to and from Morse Road. Appropriate mitigation was not considered and thus it is impossible to comment on appropriate mitigation measures.

10 TRANSPORTATION  
(This was addressed more fully under separate cover.)

The RDEIR only addresses football games and proposes that visitors should get all CHS parking, while home-town fans should park at Carmel Middle School ("CMS") and take shuttle busses. The RDEIR states that all students will be required to move their cars to CMS. The RDEIR does not adequately address the environmental impact of requiring all cars to move from CHS to CMS or how that will be effectuated or maintained. Furthermore, parking at CMS and taking a shuttle is not a requirement. The RDEIR fails to fully address the environmental impact of busses continually shuttling from CMS to CHS and back before, during and after the game(s), and fails to state whether busses will be available

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for both JV and varsity games. The RDEIR fails to address environmental or safety issues that will arise if CHS students or fans do not park at CMS and park at or near CHS instead.

The RDEIR fails to address or consider the environmental impact of additional traffic on Carmel Valley Road when all of the CHS fans are going to CMS to catch their shuttles. How will traffic be impacted, particularly at the stop light and going up the hill to Scenic Hwy 1? What is the environmental impact of the busses shuttling between CHS and CMS all night?

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#### SAFETY

The RDEIR fails to address whether there are adequate safety precautions at CMS for shuttling students and fans to CHS. Will there be security? Traffic monitoring? Will lights be on? The RDEIR fails to address the cumulative effects of lights, noise, and traffic at CMS in addition to that at CHS on Friday nights, or what the environmental impact of that will be.

The RDEIR claims that Friday night football promotes safety and school spirit, without providing any basis for this conclusory statement. The RDEIR fails to address whether students are more likely to engage in illegal or unsafe conduct at night games, such as drinking and driving. Was this even considered? What analysis was performed? How does a night game create a safer situation than a day game? How does driving home at night promote safety to teen and/or provisional drivers living in Carmel Valley, Cachagua and Big Sur after late games and practices? Was this considered? What analysis was performed?

The RDEIR fails to state or even address why school spirit is an overriding consideration for the light, noise, traffic, safety issues, and harm to wildlife and plants. It fails to address why Carmel's unique beauty should be ruined.

The RDEIR does not state how night games promote school spirit more than day games. What is this proclamation based on? Moreover, the RDEIR fails to consider whether any of the student body, their families or the community at large think that day games promote school spirit and spirit in the community. There are bold statements that the students have a "right" to Friday night football. What is this "right" is based upon? The RDEIR ignores the fact that currently, students get to experience night games for half of the season and day games, similar to the college experience and many professional games, for half of the season. What analysis was done, if any, to determine whether there is a benefit to this type of dual experience? Or whether any portion of the student body, their parents, other family members, or other community members who come to CHS day games to support the team prefer this dual system or day games at CHS?

Was any consideration given to the weather conditions at CHS for night games? The RDEIR boldly proclaims that night games will be a bigger draw for attendees, again with no basis for this broad and self-serving proclamation. Has anyone considered how cold, wet, and windy the stadium will be at night? Will this impact attendance? Will older attendees who enjoy day games quit coming if the games are at night? Will parents with small children avoid night games if they are required to sit through cold, wet and windy nights and get home late? Perhaps some of the students will choose to stay home as well. Was any analysis performed regarding these issues? Particularly in conjunction

11  
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with the inconvenience of shuttling to CHS from CMS and getting home very late after games (especially those in Carmel Valley, Cachagua and Big Sur).

Was any analysis done to determine if you are you alienating various segment(s) of the population that come to and enjoy day games? What about people who do not want to get home at 11:00-11:30 pm after shuttling down to CMS and driving to Carmel Valley, Cachagua, or Big Sur after the game? Again, what about student drivers? What about those relying on public transportation that will no longer be able to come to games? Or those students who do not drive and whose parents will either go to a game or will drop-off or pick-up on a Saturday but will not go on a Friday night or will not drop off in Friday traffic or pick up after the game to drive to the outer reaches of CUSD? Was this considered at all? Given the recent treatment of persons opposed to the stadium lights or Improvements Project, would underrepresented or alienated groups speak up about this? Sadly, CUSD has created a situation where many are afraid to speak up about their concerns for fear of finding their names in the paper, on social media, or being bad-mouthed during Board meetings.

12

#### ENERGY USE

The RDEIR fails to address the amount of electricity required to run the stadium and pool lights, as well as parking lot and new road lights. The (hidden) actual projected use does not appear to be adequately considered, or the environmental impact of said use.

The RDEIR fails to adequately consider the impact of electricity use for the lights during fires, rolling black outs, or required energy conservation. Will CUSD use inordinate amounts of electricity to power the lights when everyone else is required to conserve electricity? To run their dishwashers after 9:00 p.m.? What mitigation measures are proposed to cut back on energy use? It is impossible to comment when the mitigation measures have been omitted from the RDEIR.

13

#### LATE START

CUSD uses Late Start to justify the lights, to enable late-afternoon and evening practices. The RDEIR fails to address CUSD's actual plans for Late Start, any information about options for adjusting the bell schedules to accommodate Late Start and daylight practices. Why can't CUSD implement a last period PE class that can be used for the respective athletes to start practice? Currently a block schedule is used and not all seniors are on campus every afternoon. Can the schedule be changed to accommodate sports?

The RDEIR fails to state how bussing issues have been resolved or how bussing impacts students living in remote areas for night practices and games, or any environmental impact. This is of particular concern given CUSD's superintendent's recent public comments that there is a shortage of school bus drivers. Will all students desiring to participate in sports get to do so if bus drivers cannot be expected to work past a certain time as stated by your superintendent? How was this addressed? Can CUSD even implement Late Start if it wanted to, given the large rural area that CUSD covers? What if the "improvements" are installed and CUSD is still unable to implement Late Start due to bussing or other issues?

Finally, the RDEIR fails to address the impact of permanent daylight savings that is pending in the legislature on how Late Start will be implemented or whether stadium lights will be necessary.

14

## CONCLUSION

The RDEIR fails on many levels. It fails to adequately address several environmental and safety issues related to the bright, nightly lights, increased noise, traffic, parking and the effects of the lights on protected Scenic Hwy 1. It is biased in favor of CUSD's desire to add lights, thus failing to address environmental and safety impacts created by the "improvements" proposed in the RDEIR.


The RDEIR is inadequate in many ways. A new study should be performed to address the *actual* environmental and safety impacts created by the Improvements Project. Consideration of a stadium at CMS should be considered, with a concerted effort toward how a stadium can be built in a manner that would impact as few residents as possible, looking at realistic mitigation measures for the real problems you are creating.

Alternatively, you could leave CHS the way it is, except that you should fix the pool lights as previously promised. Hijacking the pool lights to get the stadium lights is improper and unbecoming of CUSD, particularly since CUSD created the problem in the first place and failed to follow CEQA when installing the pool lights.

Carmel is unique and beautiful. It is unfair that 5 people have the right to ruin Carmel's natural beauty forever by installing more glaring lights that will be on nearly every night of the year, as well as creating light and noise nuisances and trespassing, in conjunction with making traffic worse and creating unsafe conditions when other, better alternatives are available that would better suit the needs of the entire community, including students.

Very truly yours,

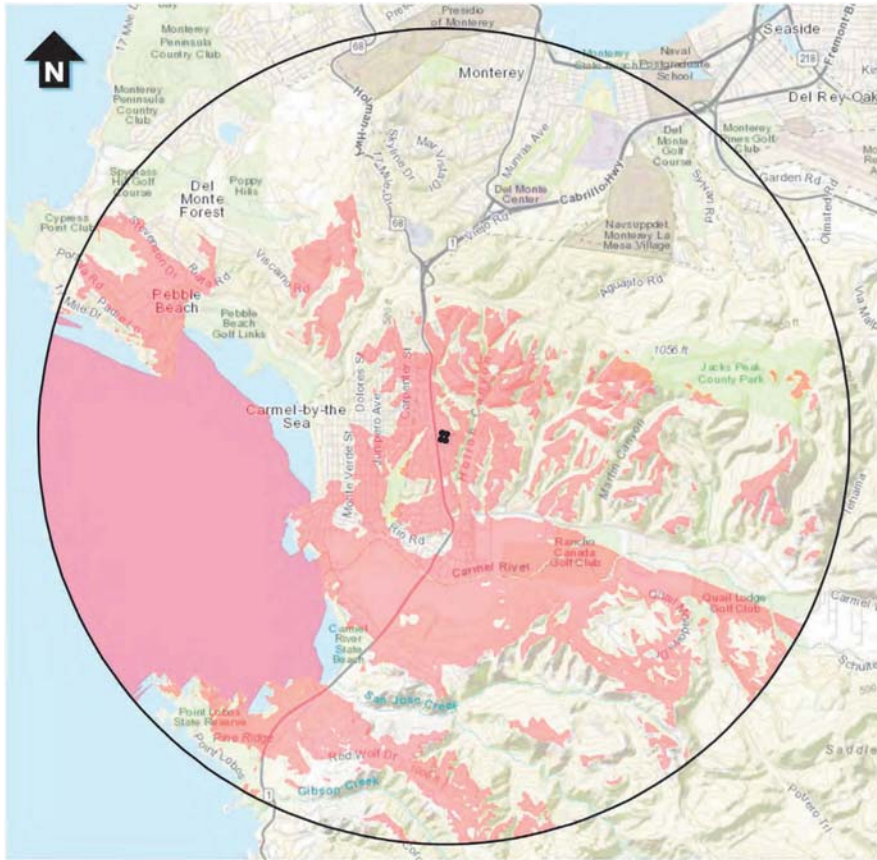
Scarborough Law



Tiffany P. Scarborough, Esq.

cc: BOE trustees





**VISIBILITY LEGEND:**

- STADIUM LIGHTS
- LIMIT OF ANALYSIS (3.5 MILE RADIUS)
- AREAS WHERE STADIUM LIGHTS MAY BE VISIBLE



Source: 3D Scape 2022  
 Note: Light poles shown on map are not to scale

Figure 5-2  
 Viewshed Analysis Map



## Response to Letter 185b, Tiffany Scarborough, Esq

1. The comment is repetitive of general comments previously stated by the commenter in Letter 185a. A reasoned and thorough response to this Letter has been made in good faith, however it should be noted that a response to this Letter is cumulative to other responses, including Letter 185a, and should be read together with the RDEIR and administrative record as a whole. This letter does not raise any new environmental issues that have not already been raised and addressed in previous letters and responses.

The commenter indicates she represents Save Carmel, a local organization of concerned Carmel residents. This comment does not raise an environmental issue and therefore, no response is necessary. See also response to Letter 185a, comment 1.

2. This comment appears to be introductory regarding general concerns, but does not provide a comment on an environmental issue. Therefore, no response is necessary. See also response to Letter 185a, comment 4.
3. The commenter asserts that the school district has misled the community with the idea that the stadium lights will only affect the community 5-6 times per year. See response to Letter 185a, comments 2 and 10. No changes to the RDEIR are required.
4. This comment is about direct effects of the lights. Lighting impacts are addressed in Section 5.0, Aesthetics of the RDEIR. Regarding the number of days the lights would be used, see response to Letter 2b, comment 2, specifically regarding the Number of Days Lights Would be on for Games and Practices and Table 4-3, Proposed Stadium and Pool Facility Lighting Schedule. Regarding the cumulative impacts of the existing and proposed lights on campus, see response to Letters 14-1-r, comment 6; Letter 14-2-m; 14-4-b; Letter 14-6-f, comment 3; and Letter 22g, comment 1. No changes to the RDEIR are required.

Regarding the light dome created by lights on foggy nights, which is also referred to as sky glow, see Section 5.0, Aesthetics in the RDEIR, as well as response to Letter 2b, comment 2, specifically under “Atmospheric Conditions.” No changes to the RDEIR are required. The impact is considered significant and unavoidable, even with implementation of mitigation measures limiting the use of the lights. See also response to Letter 185a.

5. This comment is about lighting impacts to wildlife, and the commenter asserts that the RDEIR downplays or ignores the effects on wildlife. The commenter makes a series of false assertions including “the constant bright lights on local and migratory birds, bats, insects, butterflies, and other creatures, such as red-legged frogs, as well as native plants,” “Animals and plants will be subject to artificial light nearly every night of the year,” and “effect of having the stadium lights on nearly every night of the year.” The lights will not be “constant” or on “nearly every night of the year.” Regarding the number of days and hours the lights would be on, see response to comment 4 above. Regarding impacts to wildlife, see Section

7.0, Biological Resources in the RDEIR, as well as response to Letter 131 from the California Department of Fish and Wildlife. See also response to Letter 185a. No changes to the RDEIR are required.

6. The commenter brings up the same issues in the previous letter. See response to Letter 185a, comments 6, 18, and 19, as well as comment 26. No further response is necessary.
7. Regarding the significant and unavoidable light pollution, see response to Letter 2b, comment 2 and Response to Letter 14-2-b, comment 1. See also Section 5.0, Aesthetics, of the RDEIR. No changes to the RDEIR are required.

The commenter also falsely asserts that the “lights will shine out over the lagoon and ocean” and “the lights will trespass onto and throughout the coastal zone.” The lights would not “shine out” past the boundaries of the high school campus; although, as presented in the RDEIR, the lights would be visible from numerous locations throughout the area. See Figure 5-2 Viewshed Analysis Map. No changes to the RDEIR are required.

Regarding the Key Observation Points (KOP), see the methodology in Section 5.0, Aesthetics, as well as Appendix F of the RDEIR. See also response to Letter 2b, comment 2. Regarding impacts on private residences or businesses, see response to Letter 11b, comment 27.

The commenter asserts that the KOP pictures are “clearly intended to mislead the public.” The KOP pictures the commenter refers to are the nine visual simulations in Section 5.0, Aesthetics, of the RDEIR, which were prepared to provide information to the public and the decision makers about how the lights would be visible from various locations immediately adjacent to the campus, as well as in the general vicinity. The RDEIR concludes that these impacts are significant and unavoidable even with implementation of mitigation measures limiting the days and hours of use. No changes to the RDEIR are required.

Regarding exemption from local policies and ordinances, the commenter asks this question in the previous letter. See response to Letter 185a, comment 17. The commenter also asserts that the school district is not following state and federal laws, but does not indicate to which laws she is referring. No response is necessary.

Regarding a cost-benefit analysis, the commenter asks this question in the previous letter. See response to Letter 185a, comment 26.

8. This comment is regarding noise. The commenter again makes false assertions “sustained noise levels during sporting event and practices *nearly every night of the year*. The noise impacts were evaluated by a professional noise consultant, using both factual and scientific data, the methodology of which is included in Section 10.0, Noise, and Appendix I of the RDEIR, as

well as Appendix A of this final EIR. See also response to the following letter regarding supplemental noise analysis conducted, which confirmed the conclusions of the original analysis: Letter 2b, comment 3; Letter 58b; Letter 72j; and Letter 72k. No changes to the RDEIR are required.

The commenter also falsely asserts that “constant light will affect local wildlife” and “lights are on every night that will result in increased nightly noise.” The light will not be constant and/or on every night, and will not shine beyond the boundaries of the campus.

Additionally, because the lights will not be on every night or constantly, the noise will not occur every night or be constant. Lighting and noise impacts to special-status wildlife species is addressed in Section 7.0, Biological Resources of the RDEIR. See also response to Letter 131 from the California Department of Wildlife. No changes to the RDEIR are required.

Regarding noise impacts to local businesses, there are no local businesses in the vicinity of the proposed project. See also response to Letter 58b regarding noise receptors beyond the distance studied. No changes to the RDEIR are required.

Regarding mitigation measures for noise, a mitigation measure for construction noise is included in Section 10.0, Noise of the RDEIR. Regarding operational noise (e.g., noise associated with evening practices and events associated with the lighted field), the noise impacts were determined to be less than significant based upon the County of Monterey noise standards. Mitigation measures in an EIR are only required when the impact is determined to be significant. See Section 10.0, Noise of the RDEIR for the analysis.

Please note that the project site is located within the boundaries of the County, and outside of the boundaries and jurisdiction of the City of Carmel-by-the-Sea.

9. This comment is about Traffic, Parking, and Safety and the commenter notes that “This was addressed more fully under separate cover.” See response to Letter 185a. However, a new comment is hidden within this discussion regarding the Traffic Management Plan encouraging walking and biking. See response to Letter 14-1-q, comment 2. No changes to the RDEIR are necessary.
10. This comment is about Transportation and the commenter notes that “This was addressed more fully under separate cover.” This comment brings up no new issues. See response to Letter 185a. No changes to the RDEIR are necessary.
11. This comment is about Safety. This comment was also addressed in the previous comment letter, 185a. However, a new comment is hidden within this discussion regarding “whether students are more likely to engage in illegal or unsafe conduct at night games, such as drinking and driving.” This is not an environmental issue and therefore, no response is necessary. Please also see response to Letter 14-4-d.

12. This comment is about energy use. See Section 8.0, Energy, in the RDEIR. See also response to Letters 182a and 182b. With respect to weather, see response to Letter 185a.
13. This comment is regarding Late Start and permanent daylight savings time and was previously stated in Letter 185a. Implementing Late Start is a project objective. See Section 4.0, Project Description, for a discussion of the project objectives. Regarding permanent daylight savings time, see response to Letter 2b, comment 5.
14. This comment summarizes some of the alleged issues discussed in this letter. It does not raise any new environmental issues and therefore, no response is necessary.

From: **flauralini** <[flauralini@comcast.net](mailto:flauralini@comcast.net)>  
Date: Mon, Oct 10, 2022 at 11:48 AM  
Subject: Tennis court removal  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

1

Hi, your notice doesn't include information about the tennis program at Carmel High so I'm wondering where they will play now or if you're getting rid of the program all together.

We have relatives who are thinking about attending Carmel high but they are tennis players so if you could let me know that would be terrific!

Laura

## Response to Letter 186, Laura

1. The commenter expresses concern over possible impacts to the Carmel High School tennis program as a result of the proposed project. As discussed in the RDEIR, with implementation of the proposed project, the tennis teams would practice at Carmel Middle School (see page 4-21 in the project description and Section 14.0, Recreation). They will continue to have matches off-site. See Section 3.0, Environmental Setting, and Section 4.0, Project Description, of the RDEIR. This comment does not raise an environmental issue and therefore, no further response is necessary.



From: **Chad Calnon** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Mon, Oct 10, 2022 at 1:19 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

1

As a 2014 graduate from Carmel High & former athlete, I too wanted lights on the field while I was a student. However, as one grows up and takes a step back to appreciate how unique our hometown is, it becomes clear that Carmel is no place for bright stadium lights. There is a reason that Carmel-by-the-sea does not even have or allow street lights - we are insanely lucky and blessed to be able to look up at an undisturbed night sky. I trust that the school-board understands the context of just how lucky we are and will continue to preserve the unique culture in Carmel that we all love and cherish so deeply.

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I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be

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needed for the required filing of a Statement of Overriding Considerations for any significant impacts.

3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to

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complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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## 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a “Significant and Unavoidable” impact on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from from the Carmel Views neighborhood.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr on 12/7/2021 at 5:48pm:

[https://drive.google.com/file/d/1mOqqyKOWRp60fDM\\_IrZgQMFtarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqyKOWRp60fDM_IrZgQMFtarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr on 12/7/2021 at 6:21pm:

<https://drive.google.com/file/d/1UpYMhIQj-5wRbqb38jhOidluAzZv5pIL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty.

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At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given

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this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

- i. Distributed multi-zone PA speaker system
- ii. Noise shielding, such as Acoustiblok fencing
- iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

- i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

- i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.
- ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

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A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as “Less than Significant”. Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as “federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)”, as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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##### 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.



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cont.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower when properly compared to the CHS location:

i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.

ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).

iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11X137lwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 "would cost upwards of \$72 million dollars" (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Chad Calnon

[ccalnon8@gmail.com](mailto:ccalnon8@gmail.com)

Mission btwn 5th & 6th

Carmel, California 93921

## Response to Letter 187, Chad Calnon

1. The commenter expresses their opposition to the proposed project, but does not comment on the RDEIR. Therefore, no response is necessary.
2. See response to Letter 2b.

From: **Leslie Turrini-Smith** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Mon, Oct 10, 2022 at 1:40 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

1 I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

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2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.

3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.



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i. Lights recommendations for Wellesley HS:

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The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

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B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

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E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
- ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
- iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.

a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

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In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Leslie Turrini-Smith

[turrinismith@yahoo.com](mailto:turrinismith@yahoo.com)

25631 Ryan Place

Carmel, California 93923

## Response to Letter 188, Leslie Turrini-Smith

1. See response to Letter 2b.

From: **Elizabeth Woodard** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Mon, Oct 10, 2022 at 2:16 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

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Elizabeth Woodard

[e.woodard.10@gmail.com](mailto:e.woodard.10@gmail.com)

3500 Edgefield Place

Carmel, California 93923



## Response to Letter 189, Elizabeth Woodard

1. See response to Letter 2b.

From: **Tsengtseng Chang** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Mon, Oct 10, 2022 at 2:55 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

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B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

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C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc

D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

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i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded



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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

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D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
  - ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
  - iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.
- a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the exiting track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Tsengtseng Chang

[e.woodard.10@gmail.com](mailto:e.woodard.10@gmail.com)

3500 Edgefield Place

Carmel, California 93923

## Response to Letter 190, Tsengtseng Chang

1. See response to Letter 2b.

From: **Mica Gross** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Mon, Oct 10, 2022 at 2:56 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled “Carmel High School Stadium Improvements”.

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is “Significant and Unavoidable”, yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be “Less than Significant”, and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

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Mica Gross

[mind\\_temple@yahoo.com](mailto:mind_temple@yahoo.com)

3500 Edgefield Place

Carmel, California 93923

## Response to Letter 191, Mica Gross

1. See response to Letter 2b.

Public Comment on CUSD's Revised DEIR for Proposed CHS Improvements

Alexis Delehanty  
Carmel, CA

October, 2022

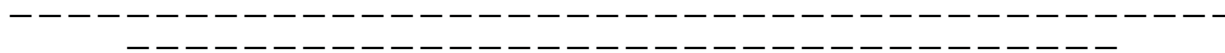
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Topic focus:

Concerns over subjecting CA SB 328 to CEQA process;  
Complying with SB 328 is an independent process and not subject to CEQA

In binding Late Start to a facilities construction project, the District has prevented stakeholders from separately addressing and engaging in the complex discussions and problem solving of how to comply with CA SB 328, diminishing and over shadowing the very important conversations around implementing CA SB 328

Inconsistency and misalignment of the Proposed Project Summary with the introduction of Late Start in the Summary of Alternatives and the Project Objectives



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The DEIR lays out the Proposed Project Summary on page 29, 2.2 outlining the multi point facilities construction project that comprises this proposal. Following the Proposed Summary, the Summary of Alternatives, page 30 2.4 and then again under Alternatives 18.0, and in section 4.1 Objectives under objective 2, "Late Start" and "late start law" is referenced and seemingly somehow becomes a key component in the districts proposed project. However there is no explanation into exactly what is Late Start, and "late start law" is not properly referenced as CA SB 328. Late Start is not a part of the proposed project summary, but all of a sudden it is portrayed as an integral component to this proposed project.

Late start and late start law needs to be properly labeled as SB 328, by not doing so the district has not been transparent to the public and has made it more difficult for the public to research and understand Late Start as CA SB 328

I ask the district to address why and how Late Start becomes bound to this project, with no explanation or in-depth analysis into what is late start and why it is a very important educational policy that CA has now made law. And as such why is the district subjecting Late Start/SB 328 to the CEQA process? In doing this has the district used its facilities project to obfuscate an important educational policy and silence the important discourse it requires?

The district needs to answer as to why Late Start has become a cornerstone of this CEQA process for a construction project; the Proposed Project Summary does not include any mention of implementation of SB 328.



Additionally,

The Objectives 4.0 that are laid out in the DEIR are misleading and lack transparency. I will address objective 1 and 2 here.

Objective 1 (page 71) is stated as , “Provide an enhanced learning environment for physical education and after school sports activities that meets contemporary standards of education and improves the District’s athletic program for its Carmel High School students and other students the District;”

What is the district stating here?

Is the district saying that nighttime football games and practices in the dark constitute an enhanced learning environment?

How does this improve the actual quality of the athletic programs, for both physical education and after school sports?

And how does this project improve coaching and curriculum standards which presumably are key components to a high quality program.

When the district in this stated objective says “meets contemporary standards of education” what exactly is it referencing??

The district has created an objective around a vague concept of standards, misleading the public.

In fact the District and CHS are governed by a very detailed set of standards laid out by the CA Department of Education

Below is a link to the California State Standards for Physical Education and an excerpt from these state standards that presumably the district is familiar with, but most likely many members of the community are not. So why has the District not taken steps here in the DEIR to explain the standards governing public schools?

<https://www.cde.ca.gov/be/st/ss/documents/pestandards.pdf>

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“Physical education significantly contributes to students’ well-being; therefore, it is an instructional priority for California schools and an integral part of our students’ educational experience. High-quality physical education instruction contributes to good health, develops fundamental and advanced motor skills, improves students’ self-confidence, and provides opportunities for increased levels of physical fitness that are associated with high academic achievement. The Physical Education Model Content Standards for California Public Schools, Kindergarten Through Grade Twelve affirms the standing of physical education; rigor is essential to achievement, and participation is not the same as education.” From A message from the State Board of Education and the State Superintendent of Public Education in the CDE state standards framework

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No where in the State Standards does it state that to pursue and achieve these standards a District must have lighted stadiums. And there is no reference to “contemporary standards of education” in the CA Department of Education State Standards for Physical Education

Has the District installed its own set of unspecified standards in lieu of the CA State Standards in the DEIR? And why?

4

The California Department of Education does also address requirements around facilities. We, as the public understand from common sense that it does so because the design and condition of facilities has a great impact on student learning and well being. The CA Department of Education concerns itself with facilities to ensure public funds are spent appropriately and in the use of providing the necessary school facilities. ( from the CDE School Construction/Modernization Design Standards and Title 5)

But there is a difference between high quality school facilities that are necessary to carry out the states educational standards and goals, and unnecessary amenities. The CA Department of Education specifically refers to stadium lights as amenities;

“.....schools look different throughout the state, and this wide variation has given rise to the state policy discussions on both fiscal realities and equity issues. From the fiscal perspective, what should a school that receives state construction funds look like? The equity perspective questions why some communities have large schools with **amenities such as swimming pools and lighted stadia**, while other communities' schools consist of rows of portables with students eating at uncovered picnic tables. “

CA Dept of Ed website header School Construction/Modernization Design Standards  
<https://www.cde.ca.gov/ls/fa/sf/standardsrdtable.asp>

Yet the Districts DEIR and stated Objectives 4.0 number 1, misleads the public and implies that CHS is not up to some set of standards that is no where laid out in DEIR or consistent with State Standards.

5

Objective 2 states , “Provide athletic facilities that facilitate implantation of the State’s “late start law” **without disruption to the Districts existing educational and athletic programs.**”

**The DEIR in its Objectives number 2, is deeply flawed and the public deserves greater transparency and detailed explanations, so as not to be misled.**

The first disservice to the public here is the Districts setting up an unreasonable and impossible expectation. The impossible expectation set forth here is the idea that a new educational policy “late start” can be implemented without any disruption to existing programs. Implementing any change ALWAYS requires adjustments and disruption...it is the very nature of change. In setting forth an impossibility, the District has set up all other Alternatives to fail.

With this objective, the district has once again shifted the focus away from separately carrying out important in-depth discussions on late start and finding workable solutions to

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implementing this important policy/law and instead uses it to set forth a limited objective to justify a construction project, that has nothing to do with SB 328.

This objective leaves no room for the the necessary adjustments a new educational policy requires.

The district needs to re state this objective to reflect that SB 328 late start is a completely separate objective for the district, one which is not governed by CEQA and there fore has no reason to be included in this DEIR.

6

**The district would better serve its students, parents and the community by addressing SB 328 as it should be addressed, outside of CEQA and in meaningful and detailed discussions with all stake holders.**

In so doing, all stake holders will gain transparency and knowledge into why SB 328 is a crucial new law to discuss and implement.

Stakeholders need to be given the opportunity to understand and recognize the science behind SB 328 and that there are no real opposing viewpoints; and while there are obstacles, specifically around transportation, athletic schedules and resistance to change, these obstacles are surmountable. In fact, data from schools that have already implemented late start schedules supports the success of the policy and program.

There are real solutions to late start that do not require a huge expensive facilities construction project. If the District wishes to pursue further augmenting its amenities, it may do so but not at the expense of late start.

7

Additionally, I want to point out issues in the DEIR around Bell Schedules.

The DEIR states that compliance with SB 328 will result in a new bell schedule with a release time of 3:45 except on Thursdays, when end of school is 3:15. There is no explanation as to the process the District went through to come up with this new Bell Schedule nor Why this is the only bell schedule option.

Again, replacing the existing bell schedule to implement Late Start should be subject to a thoughtful and in depth process with stakeholders. Schools across the State and Country that have adopted a Late Start have utilized creative ways to arrive at bell schedules that best serve their students, and these bell schedules are not all the same. In other words there isn't only one bell schedule to accommodate Late Start, yet that is the implication from the District in the DEIR.

And the DEIR omits any recognition of the fact that under the current CHS bell schedule, many student athletes have to miss last period to attend games and practices and/or practice before school.

In fact, the DEIR omits any reference of the many proven positive benefits of Late Sart/SB 328. And among the many benefits to changing school start to a later time and giving adolescents the sleep they require, are the known results that more and better sleep improves athletic performance and greatly reduces injuries. In fact, the trend in professional sports is in utilizing better sleep for competitive advantage. (The Atlantic "How School Start Times Affect High School Athletes" by Alex Putterman)

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<https://www.theatlantic.com/education/archive/2017/04/how-school-start-times-affect-high-school-athletics/522537/>

8

The omissions by the District in the DEIR around the reasons for Late Start and an in-depth analysis has robbed the stakeholders the opportunity to engage in separate and meaningful discourse in finding creative and positive solutions to the surmountable obstacles in implementing Late Start. In small towns and large cities across the State and Country, schools have been successful in finding ways to make the all important change to a later start.

And athletic departments and directors have sought creative solutions, involving efficiencies in practices and transportation, and other strategies. There is clear evidence that a change in start time has direct and immediate meaningful positive impacts to adolescents in the district. And that the obstacles of transportation, athletics and resistance to change are very much surmountable. (From "Why all the Fuss about Changing School Start Times" by Dr. Bert Madelbaum)

<https://www.njsba.org/news-publications/school-leader/november-december-2019-vol-50-no-3/why-all-the-fuss-about-changing-school-start-times/>

But the DEIR is NOT the place to be having this discussion process around Late Start/ SB 328, so TAKE IT OUT of the DEIR.

## Response to Letter 192, Alexis Delehanty

1. This first comment is a preface or summary of the issues that will be raise in the letter, and expresses general concerns over subjecting SB 328, also known as the Late Start Law, to the CEQA process. (See Ed. Code, §46148.) This introductory comment does not include any environmental issues that are not addressed in the following response.
2. The comment alleges that the “Late Start Law” is not properly referenced as “CA SB 328” in the RDEIR, making it more difficult for the public to research and understand Late Start. However, the proper legal citation to the statute where the Late Start Law can be found is Section 46148 of the Education Code. Senate Bill (“SB”) 328 is merely a reference to legislation from 2019 that added Section 46148 to the Education Code, effective January 1, 2020. Education Code Section 46148 and its implementing legislation are commonly referred to as the “Late Start Law”. (See <https://www.carmelunified.org/domain/776>.) However, for clarification purposes, a footnote referencing Education Code Section 46148 shall be added as a footnote on page 4-1 of the RDEIR. See Section 3.0, Revisions to the Revised Draft EIR, in this final EIR.

The comment identifies numerous Sections of the RDEIR that reference “Late Start” and the “Late Start Law,” and the commenter interprets the discussion of Late Start in the RDEIR as binding Late Start to the proposed project and the CEQA process. As acknowledged by the commenter, Late Start is referenced in Project Objective 2, which states: “Provide athletic facilities that facilitate implementation of the State’s ‘late start law’ without disruption to the District’s existing educational and athletic programs.” (See RDEIR, §4.1, p. 4-1.)

CEQA requires that a project description include a statement of the objectives sought by the proposed project. (CEQA Guidelines, §15124(b).) Under CEQA, “The statement of objectives should include the underlying purpose of the project and may discuss the project benefits.” (Ibid.) The project objectives should help the lead agency develop a reasonable range of alternatives to evaluate in the EIR. (Id.) Moreover, a lead agency has broad discretion to formulate project objectives. (*Calif. Oak Found. v. Regents of Univ. of Cal.* (2010) 188 Cal.App.4th 227, 276.)

The commenter notes that Late Start is not a part of the proposed project summary, and questions why it is “portrayed as an integral component to this proposed project.” Such comments appear to be predicated on the misapprehension that Late Start is such an important project objective that it must be treated as the project itself. In fact, facilitating the implementation of Late Start is just one objective of the project, out of a total of 14. For further discussion of the project objectives, please refer to Section 4.1 of the RDEIR.

Similarly, project alternatives discussed in Section 18.0, Project Alternatives, of the RDEIR, include alternatives that meet the Late Start objective (Alternative 2 and Alternative 4), as well as alternatives that do not (Alternative 1, Alternative 3, and Alternative 5).

The comment also states that Late Start is “a very important educational policy that CA has now made law.” However, this comment similarly confuses this project objective with the project itself (as discussed above), and further appears to be premised on a misunderstanding of the Late Start Law. Specifically, the Late Start Law requires high schools to set the beginning of the school day no earlier than 8:30 a.m., and middle schools to set the beginning of the school day no earlier than 8:00 a.m. no later than July 1, 2022. (Ed. Code, §46148(a); See gen. RDEIR, pp. 2-3, 18-6, et seq.) However, subsection (d) of Education Code section 46148 states Late Start requirements “shall not apply to rural school districts.” (Ed. Code, §46148(d).) Based on the designation of rural status for the purposes of funding under the E-Rate program, Carmel Unified School District is exempt from the Late State Law. Accordingly, the district has the option, but is not required, to implement Late Start. (See CUSD Late Start webpage: <https://www.carmelunified.org/domain/776>; Hanover Research Priority Brief on School Start Times in Rural Districts: <https://www.carmelunified.org/cms/lib/CA01000917/Centricity/Domain/776/Research%20Brief%20School%20Start%20Times%20in%20Rural%20Districts.pdf>.)

3. The comment alleges that Project Objective 1 is misleading and lacks transparency. Project Objective 1 states: “Provide an enhanced learning environment for both physical education and after-school sports activities that meets contemporary standards of education and improves the District’s athletic program for its Carmel High School students and other students in the District.” (RDEIR, p. 4-1.)

However, objectives chosen should be broad enough to permit a reasonable range of alternatives. (Calif. Oak Found., *supra*, 188 Cal.App.4th at 274.) Project Objective 1 serves the requisite purpose of assisting in the development and evaluation of a reasonable range of alternatives. For example, the objectives of providing “an enhanced learning environment for physical education and after school sports activities that meets contemporary standards of education and improves the District’s athletic program for its Carmel High School students and other students in the District” provides an appropriate frame of reference for intelligently comparing the project to its proposed alternatives. (See CEQA Guidelines, §151124(b).) The RDEIR, including this project objective, does not omit any required information necessary to informed decision-making and public participation.

School boards are delegated power and authority to control the operation of the schools, and develop policies and programs that improve performance of their schools, school facilities, curriculum, extracurricular activities, and other functions essential to the day-to-day



operation of schools within the district's boundaries. (See gen. Ed. Code, §§35160 & 35161; *Governing Bd. of Ripon Unified School Dist. v. Commission on Professional Competence* (2009) 177 Cal.App.4th 1379, 1385 [“In general, a school district has all authority necessary to fulfill its purposes except as expressly limited or preempted by statute.”]; *Dawson v. East Side Union High School Dist.* (1994) 28 Cal.App.4th 998, 1019 [“It follows that courts should give substantial deference to the decisions of local school districts and boards within the scope of their broad discretion, and should intervene only in clear cases of abuse of discretion.”].) In general, developing school sites that reflect 21st century changes in education, contemporary standards of education, green building measures, and adequate athletic facilities is within the district’s purview, and serves the intent of the Facilities Master Plan. (See Ed. Code, §35160.1(a)[“school districts ... have diverse needs unique to their individual communities and programs. Moreover, in addressing their needs, common as well as unique, school districts ... should have the flexibility to create their own unique solutions.”]; Ed. Code, §51002 [“because of economic, geographic, physical, political and social diversity, there is a need for the development of educational programs at the local level”]; Ed. Code, §35179(a) [“Each school district governing board shall have general control of, and be responsible for, all aspects of the interscholastic athletic policies, programs, and activities in its district, including, but not limited to, ... sports facilities.”]; Cal. Dept. of Education, School Construction/Modernization Design Standards: <https://www.cde.ca.gov/ls/fa/sf/standardsrtable.asp> [“LEAs have wide latitude in the design of their schools...”].)

The comment does not raise an environmental issue, and therefore no further response is necessary.

4. This comment sets forth CDE standards pertaining to school construction projects receiving state funds, but does not concern an environmental impact. However, if approved, no local bond or state funding will be used for the proposed project. The district allocated money from reserves for the project. No revisions to the RDEIR are needed.
5. This comment states that Project Objective 2 is “deeply flawed,” but does not raise an environmental issue. However, Project Objective 2 serves the requisite purpose under CEQA. For example, without reference to the district’s objective of providing athletic facilities that facilitate Late Start without disruption to the District’s existing educational and athletic programs, an informed decision could not be made regarding beneficial uses of stadium lights as proposed in the project or Alternative 4 compared to the other Alternatives.

Nothing in Project Objective 2 preordains that the proposed project has to be approved as presented in the RDEIR. The district board has the option to select any of the alternatives rather than the proposed project, including those alternatives that meet the Late Start objective. See response to comment 2, above.

No further response is needed.

6. The comment expresses support for Late Start, but does not specifically address the proposed Project or RDEIR, or raise an environmental issue. No further response is needed.
7. This comment concerns proposed bell schedules set forth under Alternative 2 – No Project Alternative With Late Start. When setting a bell schedule, the District must consider the limits of sound educational pedagogy and maintain parity in grade configuration and educational approach. This comment does not raise an environmental issue, and no further response is needed.
8. The comment restates its opposition to inclusion of Late Start as a project objective in the RDEIR. The comment does not raise an environmental issue, and therefore no further response is required.

From: **Lauren Allen** <[info@sg.actionnetwork.org](mailto:info@sg.actionnetwork.org)>  
Date: Mon, Oct 10, 2022 at 3:35 PM  
Subject: Public Comment on RDEIR for CHS Stadium Lights  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

RDEIR feedback RDEIR Feedback,

To CUSD board members and Superintendent Ted Knight:

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I am submitting the following comments on the Revised Draft EIR titled "Carmel High School Stadium Improvements".

I disagree strongly with many aspects of the RDEIR, which are summarized here and discussed in more detail below:

1. Many of the objectives of the project are off-base and worded specifically to favor this project and disfavor all of the alternatives.
2. The impact from the lights is "Significant and Unavoidable", yet it still allows up to 400 practices and 124 games at night, all without performing a cost-benefit analysis that would be needed for the required filing of a Statement of Overriding Considerations for any significant impacts.
3. The impact from noise and traffic resulting from this project are both incorrectly assessed to be "Less than Significant", and this is due to major errors/omissions in the analysis, as well as selective bias in the data being used.

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4. The current project violates multiple regulations/ordinances but fails to provide any explanation or justification for why an exception should be granted for this project to circumvent these rules.

5. Several of the alternatives would meet the core objective of enabling practice with a Late Start class schedule, but the RDEIR fails to properly consider these alternatives due to major errors/omissions in their assessment.

Each of the numbered sections below correspond to the numbered items above.

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#### 1. Flaws in the Objectives

There are many issues with the objectives stated in the RDEIR, many of which are new objectives that have been added since the initial Draft EIR published in August 2021, and these objectives are improperly designed to improperly favor the current project instead of the alternatives.

A. Project objective 3 stating "host sport events...in the evening when...can more easily attend" is not based in fact and is clearly false for many (e.g. people who work late on weekdays but are available on weekends).

B. Project objective 4 stating "Improve athlete and spectator safety during evening sports events and games" is nonsensical as there are currently no evening events and is not a valid objective since it's simply making night events itself an objective.

C. Project objective 8 stating "replace outmoded athletic lighting fixtures" is completely unrelated to the new stadium lights and should be addressed independently, regardless of whether this project moves forward. In particular, it's clear this objective was added due to complaints about the pool lights that were installed without following CEQA process, and these should be replaced regardless of whether lights are installed at the football stadium.

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#### 2. Flaws in the Impact of the Lights

The RDEIR is correct to assess that the lights will have a "Significant and Unavoidable" impact

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on the viewshed in Carmel, yet it fails to provide sufficient mitigations to address these huge “effects on scenic vistas and the visual character” of the entire greater Carmel region.

A. The RDEIR fails to consider atmospheric moisture assessing the impact of the lights. This has been determined by lighting experts to increase the impact by up to 10x, yet none of the simulated images in the RDEIR analyzed this. The impact of atmospheric moisture has already been demonstrated to be very significant with just the current pool lights, evident in photos taken on 12/7/2021 from from the Carmel Views neighborhood.

i. Light expert analysis: <https://concernedmontereyhighneighbors.com/Comments-Light-Expert-Benya.pdf>

ii. Pool lights photo from Pine Hills Dr on 12/7/2021 at 5:48pm:

[https://drive.google.com/file/d/1mOqqyKOWRp60fDM\\_lrzqQMfTarGEWSS2/view?usp=sharing](https://drive.google.com/file/d/1mOqqyKOWRp60fDM_lrzqQMfTarGEWSS2/view?usp=sharing)

iii. Pool lights photo from Outlook Dr on 12/7/2021 at 6:21pm:

<https://drive.google.com/file/d/1UpYMHlQj-5wRbqb38jhOidluAzZv5pIL/view?usp=sharing>

B. Despite such a significant impact, the RDEIR admits there will be 350-400 practices and 74-124 games each year that will use the lights. This is practically every day of the school year, so all of the following additional mitigations are needed and critical to preserving the scenic vistas and visual character of Carmel:

i. Disallow lights usage on weekends for any use, period.

ii. Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.

iii. Limit lights usage for practice to be only and specifically for addressing Late Start, i.e. allow lights on weekdays for practice to be no more than 1 hour after sunset

C. The RDEIR proposes a lights usage policy (albeit with minimal limitations that are not sufficient), but school policies are subject to change so there is nothing prescribed to ensure the policy is not changed in the future for the worse, such as by future CUSD board or faculty. At a minimum, the community must have a direct say for, and ability to overrule, any alterations to the lights usage policy in the future.

D. The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. For example, see these recommendations for Wellesley High School stadium lighting. So, instead of taking down trees, this project should be putting up additional trees for the betterment of Carmel.

i. Lights recommendations for Wellesley HS:

<https://wellesleyma.gov/DocumentCenter/View/25353/Wellesley-Sports-Lighting-report-8-30-21-BP>

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### 3. Flaws in the Impact of Noise and Traffic

The RDEIR is incorrect in assessing that noise and traffic from this project will be “Less than significant”, due to significant errors/omissions, as well as selective bias in the data used.

A. The RDEIR claims that football game noise levels would average 50-60 dB (Leq) and peak within 60-70 dB (Lmax). However, there are many studies showing noise levels far exceeding this, with high school football games peaking over 80 dB at Waunakee HS and over 100 dB at college games. The noise analysis in the RDEIR inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS).

i. Waunakee HS noise analysis: <https://nonewstadium.org/noise-levels>

ii. College game noise analysis: <https://www.caohc.org/updatearticles/spring2015.pdf>

B. The RDEIR dismisses noise as a less than significant impact because it states on page 10-3 that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is incorrect because the only noise levels measured in the RDEIR that exceed 70 dB are peak noise levels (Lmax). The RDEIR admits that existing average noise levels are between 28.5 (LT-1) and 55.4 dB (LT-4), which is well below the 70 Ldn standard and much less than the likely expected noise levels for games (discussed in item 3A).

C. The RDEIR fails to provide meaningful mitigations for the noise impact, likely due to its inaccurate assessment that it will be less than significant. It is clear that noise impact will likely be “Significant” per items 3A and 3B, and the RDEIR needs to provide for mitigations given this reasonable probability. The following mitigations are implemented at other stadiums and should be included in this project:

i. Distributed multi-zone PA speaker system

ii. Noise shielding, such as Acoustiblok fencing

iii. Policy to prohibit all noise makers, e.g. air horns, megaphones, etc



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D. The Traffic Management Plan (TMP) fails to provide any solutions that would handle large events where there can be up to 617 cars vying for just 387 parking spaces. There would no space to accommodate an excess of 230 cars, so any reasonable analysis of the CHS access routes would conclude that a large number of excess cars will likely back up onto SR1 or neighboring streets. This creates a serious safety hazard and has been seen already during current Saturday afternoon football games. As a result, it is incorrect for Impact 11-2 to be assessed as “Less than Significant” and should be changed to “Significant and Unavoidable”.

i. Photo of cars backed up on SR1:

<https://drive.google.com/file/d/1zvn2zHN0iIR2KCzj3FiXK2F3SGWDCL0g/view?usp=sharing>

E. Mitigation Measure 11-4 (f) states parking will be “residents only during special events”, but this is ambiguous and appears to be limited to only the largest events. Since there won’t be sufficient parking for all possible events (RDEIR admits parking “would be deficient by 230 parking spaces (617 demand - 387 total spaces)”), even with the 2 additional new parking lots, this mitigation must also:

i. Explicitly cover all publicly attended events, to ensure there are never any events that can overflow into the nearby streets and hinder parking by residents or access by emergency vehicles.

ii. Also, to ensure overflow parking does not simply shift to the west side of SR1, the residents-only restriction needs to be expanded to any streets within walking distance of CHS, such as Hatton Rd.

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#### 4. Violations of Regulations/Ordinances

The RDEIR discusses various areas where this project would violate legislation, regulations, local ordinances, etc. These regulations were designed to minimize impact of development projects and it is negligent for the CUSD to circumvent them, even if it has the legal exception to do so.

A. The RDEIR admits that impact from the lights is “Significant and Unavoidable”, which requires filing of a Statement of Overriding Considerations. However, the RDEIR does not perform a cost-benefit analysis that would be needed to properly justify any significant impact. When can CUSD provide a cost-benefit analysis for this project?

B. The RDEIR admits that protected trees (“special status plant species”) would likely be damaged or removed for the 18-foot drive aisle that was newly added to this expanded

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project. These are mature trees so they cannot be replaced with equivalent ones, so the RDEIR is incorrect in assessing Impact 7-6 as "Less than Significant". Why is this project allowed to harm regulated trees?

C. The RDEIR admits that it violates GMP 3.3 states "Development shall maintain no less than a 100-foot setback from the scenic route right-of-way". However, the football stadium is within 65 feet of Hwy 1 (see map image here), and the proposed new parking lot and access road (demolition of the tennis courts) is within 60 feet of Hwy 1 (see map image here). Why is this project allowed to violate this Monterey County regulation?

i. Map image of setback for stadium:

<https://drive.google.com/file/d/114OMryC5EnoCNOvunfRMI09Wq99rBuo7/view?usp=sharing>

ii. Map image of setback tennis court: [https://drive.google.com/file/d/1151H1r5-](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

[GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing](https://drive.google.com/file/d/1151H1r5-GUCp3GKGAstHtwltAw4g9fPu/view?usp=sharing)

D. The RDEIR admits that the lights will be visible from as far as Point Lobos and Jacks Peak, and many of the affected areas are protected spaces, such as Point Lobos and large stretches within the California Coastal Zone. It also admits that there are endangered species that may be impacted, such as "federally threatened California red-legged frog (*Rana draytonii*), state endangered foothill yellow-legged frog (*Rana boylei*)", as well as other wildlife, such as the red-shouldered hawk (*Buteo lineatus*). Why is this project allowed to potentially violate the Endangered Species Act, or impact protected spaces, such as a state park or the coastal zone?

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## 5. Flaws in Evaluating Alternatives

The RDEIR analysis of the alternatives is flawed by errors and omissions, resulting in a biased conclusion favoring the proposed project and dismissing the alternatives.

A. The RDEIR fails to consider the Sunshine Protection Act, which has already passed the US Senate and is expected to also pass the House of Representatives. Including this into "Alternative 2 No Project Alternative - With Late Start" would allow Alternative 2 to be the only alternative that meets all major project objectives while also avoiding all impacts.

B. Alternative 4 is claimed to "not avoid the significant impacts described in Table 2-1", but this is clearly untrue, for the reasons cited below. So, the assessment of this alternative needs to be redone/corrected to properly compare its impacts, which will likely be significantly lower

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when properly compared to the CHS location:

- i. The number of homes impacted by both lights, traffic and noise will be much higher at CHS than at CMS, due to the much higher density and number of homes. For example, there are about 152 houses within ¼ mile of CHS, versus 29 houses and 58 apartments (Cottages of Carmel) within ¼ mile of CMS. This means the impact of lights/noise/traffic/etc at CHS would affect over 2x as many homes/people than at CMS.
  - ii. Traffic impact at CHS would be significantly higher due to congestion from proximity with SR1 (many more cars than on Carmel Valley Road) and residential neighborhood (many more homes than around CMS).
  - iii. CHS stadium is at 335-ft above sea level, so 80-ft light pools will be projecting at a height of >400-ft elevation. This will be significantly more visible/impactful than at CMS which is at 30-ft elevation (i.e. sea level). The RDEIR fails to perform a viewshed analysis for the CMS alternative, which is necessary for a proper comparison to having lights at CHS.
- a. Here is a viewshed comparison (via Google Earth) of 80-ft lights at CHS vs CMS:

<https://drive.google.com/file/d/11XI37IwpARw8VIDjmlIXGRGjjLJXG22j/view?usp=sharing>

C. The RDEIR says Alternative 4 “would cost upwards of \$72 million dollars” (page 358, 18-18) but this is based upon excessive and unnecessary added construction, including demolishing and moving the track/stadium, tennis courts and baseball field, instead of leveraging the existing ones at CMS. This is a false equivalence and has the appearance that this alternative was intentionally rigged to be unacceptable. Instead, another alternative needs to be defined that leverages the existing track/stadium, which will have significantly lower costs and impacts.

In summary, all of the above flaws/issues in the RDEIR need to be corrected before an accurate evaluation of the project can be considered by the public. As it currently stands, the proposed mitigations are not sufficient to reduce the many significant impacts of this project, so I strongly oppose allowing this project to move forward.

Lauren Allen

[laurenmallen.3@gmail.com](mailto:laurenmallen.3@gmail.com)

3775 Whitman Circle

Carmel, California 93923

## Response to Letter 193, Lauren Allen

1. See response to Letter 2b.

From: **Save Carmel** <[getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org)>

Date: Mon, Oct 10, 2022 at 4:13 PM

Subject: RDEIR comment: Light and Glare Impacts evaluation fails to consider atmospheric moisture

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

1 | [Light and Glare Impacts evaluation fails to consider atmospheric moisture](#)

Section 5-2 (pages 5-40 to 5-64) fails to consider the largest potential factor on the impact of the lights: atmospheric moisture, such as marine layer or fog. The impact of this has been shown to magnify the impact of the lights by 5-10x.

Lighting experts are familiar with this phenomenon, such as [described here by James R. Benya, PE, FIES, FIALD](#) on page 12:

From my experience measuring the impact of the marine layer along the California Coast from Marin down to San Diego at various sites, it is my opinion that increased ambient light levels onto adjacent and nearby properties of between 1 and 10 lux will likely occur often on marine layer evenings. This impact is significant and has an adverse effect on the entire scenic vista whether seen by a “sensitive receptor” or an ordinary resident.

And on page 16:

The likelihood of marine layer conditions at night is far higher and the impact far greater than at San Marin High. It will be more like San Diego Bay where I have measured lighting levels on the ground (at Sea World 17 and downtown at the site of the new Symphony on the Bay) 10 times greater with a dense marine layer than the normal light pollution with a clear sky.

The impact of atmospheric moisture has been proven by the pool lights at Carmel High School to be many times worse than when there is no moisture. Here are two original/unedited/unfiltered images taken from Carmel Views on 12/7/2021:

Photo from Pine Hills Dr on 12/7/2021 at 5:48pm (36°33'38.5"N 121°53'39.1"W), [link to orig file here](#):

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Photo from Outlook Drive at on 12/7/2021 at 6:21pm (36°33'30.1"N 121°54'01.5"W), [link to orig file here:](#)



The RDEIR itself admits on page 6-1 that the area “is located within the North Central Coast Air Basin” where a “semi-permanent high-pressure cell in the eastern Pacific Ocean is the basic controlling factor in the air basin’s climate” and this results in “Onshore air currents pass over cool ocean waters to bring fog”. Yet, the RDEIR fails to consider moisture in any way in the evaluation of the lighting impact.

Why has the RDEIR failed to consider atmospheric moisture when evaluating the impact of the lights? This can and should be included in the EIR because the frequency of atmospheric moisture in the Carmel region will mean it will be the most common, primary impact experienced in Carmel.

Why does the RDEIR fail to consider existing research and prior art in evaluating the increasing/multiplying effects of atmospheric moisture? Ignoring the well-known effects of atmospheric moisture on outdoor lighting suggests that the RDEIR is deliberately avoiding it, in an effort to minimize the lighting impacts.

--The Save Carmel Team

<https://savecarmel.org>



## Response to Letter 194a, The Save Carmel Team

1. This comment is about lighting impacts associated with atmospheric moisture. See Section 5.0, Aesthetics regarding sky glow impacts and response to Letter 2b, comment 2. No changes to the RDEIR are required.

From: **Save Carmel** <[getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org)>

Date: Mon, Oct 10, 2022 at 4:14 PM

Subject: RDEIR comment: Mitigation Measure 5-2a: lights usage policy does not prevent expanded future usage

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

1 | [Mitigation Measure 5-2a: lights usage policy does not prevent expanded future usage](#)

School policies are subject to change and there is nothing prescribed to ensure Mitigation Measure 5-2a is not changed in the future for the worse, such as by future CUSD board or faculty. This mitigation measure needs to include rules restricting changes to this policy, including all of the following:

- 1) Changes require a supermajority of residents within 1 mile of the stadium, e.g. via mailer/website/email for residents to vote/object
- 2) Changes require a unanimous vote of the CUSD board

Since the lighting impacts are Significant and Unavoidable, the RDEIR needs to ensure that this mitigation is valid for the life of the stadium lights.

--The Save Carmel Team

<https://savecarmel.org>

## Response to Letter 194b, The Save Carmel Team

1. Comment noted. The mitigation measure, once adopted by the school board, is binding on the school district. It could only be changed through Board action in accordance with Board Policies and Administrative Regulations, which, in this particular instance, would require undergoing another CEQA process to evaluate the environmental impacts of such action. The mitigation measure does not need to be modified. No changes to the RDEIR are required.

From: **Save Carmel** <[getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org)>

Date: Mon, Oct 10, 2022 at 4:15 PM

Subject: RDEIR comment: CUSD must file Statement of Overriding Considerations with Cost-Benefit Analysis

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

1 | **CUSD must file Statement of Overriding Considerations with Cost-Benefit Analysis**

Since Impact 5-2 states the lights will be "Significant and Unavoidable" even after mitigation, CEQA requires the CUSD to file a Statement of Overriding Considerations. Has CUSD filed this? If so, where can this be found? If not, when will this be filed and shared with the public?

To support the Statement of Overriding Considerations, a cost-benefit analysis needs to be performed to properly justify the significant impact of the lights, because these lights (and their associated noise, traffic, etc) which will fundamentally change Carmel from what the local legend Barbara Livingston describes as "a village in a forest by the sea. Everyone in our community understands the simple truth of these words in defining our village's character."

Has a CBA been performed? If so, where can this be found? If not, when will this be filed and shared with the public?

--The Save Carmel Team

<https://savecarmel.org>

## Response to Letter 194c, The Save Carmel Team

1. Regarding a statement of overriding considerations, see response to Letter 2b, comment 2, under cost-benefit analysis; and Letter 14-2-g, comment 4. No changes to the RDEIR are required.

From: **Save Carmel** <[getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org)>  
Date: Mon, Oct 10, 2022 at 4:16 PM  
Subject: RDEIR comment: Lacking mitigation with trees  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

1 | [Lacking mitigation with trees](#)

The RDEIR fails to consider mitigation of the lights with tall trees, which is a common approach to reduce the impact. This is particularly critical since the RDEIR admits the impact will Significant and Unavoidable.

For example, from the [recommendations for Wellesley High School stadium lighting](#):

Like light trespass, it too can be mitigated by lighting design and blockage (manmade [walls, fabric, etc.] or natural [trees, buildings, etc.]). Unlike light trespass, glare's ability to be perceived as a nuisance at great distances can impact viewers in the direct line of sight far from its source

Instead of removing trees, which is likely due to the construction of the access road and parking lots, why does this project fail to mitigate both the lighting and loss/damage to trees with additional tall trees that would help mitigate both?

--The Save Carmel Team

<https://savecarmel.org>



## Response to Letter 194d, The Save Carmel Team

1. Regarding mitigating with tall trees, see response to Letter 2b, comment 2.

From: **Save Carmel** <[getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org)>

Date: Mon, Oct 10, 2022 at 4:15 PM

Subject: RDEIR comment: Mitigation Measure 5-2d: IDA will not certify if within 500' of homes

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

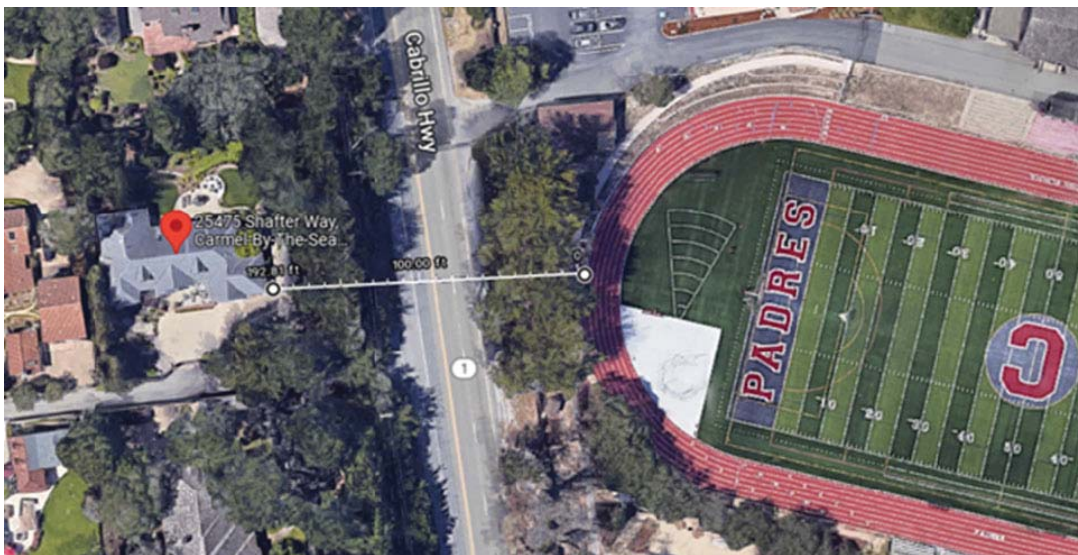
Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

1 Mitigation Measure 5-2d: IDA will not certify if within 500' of homes

The IDA has stated that they will not certify any installation as being dark sky compliant when it is within 500 feet of any residences. The lights will be easily within 500ft of homes on all 3 sides that are adjacent to homes.

The RDEIR needs to notify the IDA of the proximity of homes to the proposed lights and confirm that these lights can actually be certified as “dark sky”.

25474 Shafter Way: 202 feet

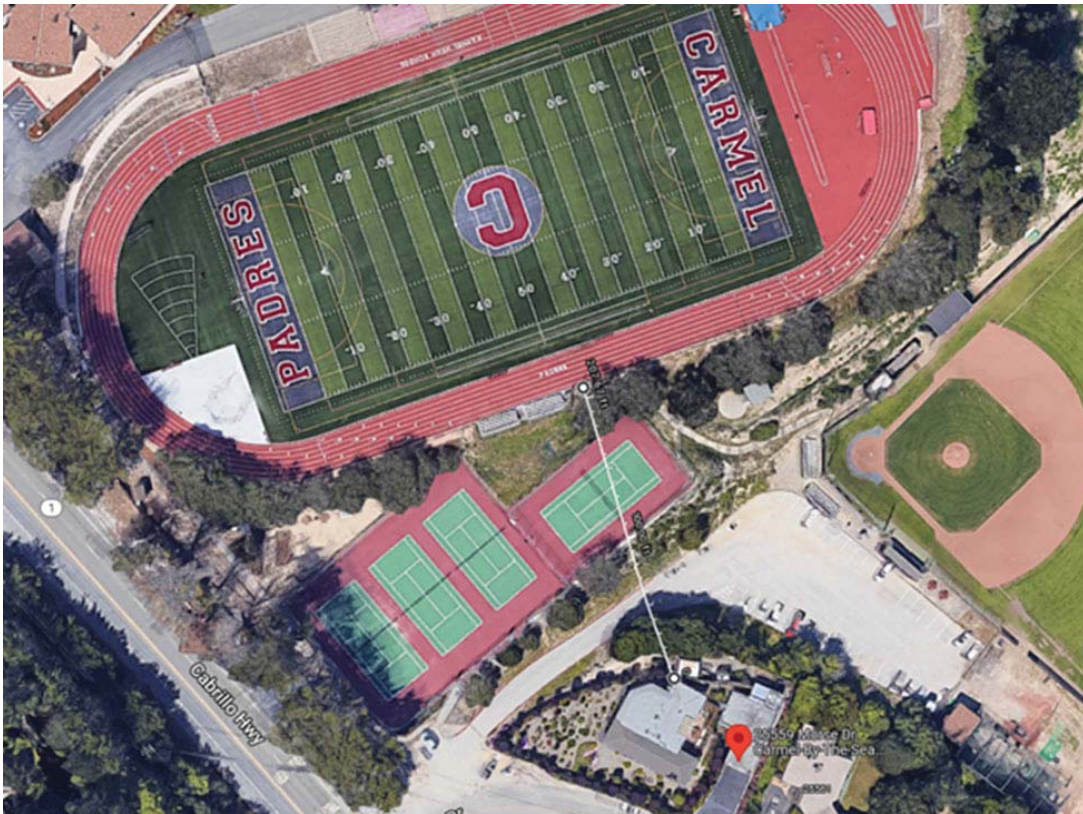


25476 Flanders Dr: 335 feet

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con't.



25559 Morse Dr: 207 feet



--The Save Carmel Team

<https://savecarmel.org>

## Response to Letter 194e, The Save Carmel Team

1. Regarding IDA certification, see response to Letter 14-3-h, comment 4. Please refer to Figure 4-1 in Section 4.0, Project Description, of the RDEIR for specific information regarding proposed location of stadium lights. No changes to the RDEIR are required.

From: **Save Carmel** <[getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org)>

Date: Mon, Oct 10, 2022 at 4:16 PM

Subject: RDEIR comment: RDEIR incorrectly claims that the stadium's higher elevation is providing acoustic shielding

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

1 | [RDEIR incorrectly claims that the stadium's higher elevation is providing acoustic shielding](#)

The RDEIR states on page 7-29 and 10-13 that the stadium's higher elevation than the neighborhood is "providing topographic acoustic shielding from some of the noise sources". However, this is false because:

- 1) Homes to the north of CHS (e.g. Stewart Pl, Flanders) are at an even higher elevation
- 2) There are many homes in nearby neighborhoods at even higher elevations, without anything in between to dampen the noise, such as to the east in Carmel Knolls and Carmel Views

It can be easily proven that noise from the stadium carries to these neighborhoods and can even amplify across the canyon (e.g. to Carmel Views), just by measuring noise levels projected via speakers from the aforementioned neighborhoods. The RDEIR must perform these simple measurements before it can claim anything about acoustic shielding or claim that Impact 10-1 is less than significant.

--The Save Carmel Team

<https://savecarmel.org>



## Response to Letter 194f, The Save Carmel Team

1. Regarding acoustic shielding, see responses to Letter 58b, comment 10; Letter 72j; and Letter 72k. No changes to the RDEIR are required.



From: **Save Carmel** <[getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org)>

Date: Mon, Oct 10, 2022 at 4:17 PM

Subject: RDEIR comment: RDEIR fails to quantify the increase in average/sustained noise levels during large events

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

1 There are several errors and omissions in the RDEIR that result in an inaccurate assessment of Impact 10-1 being less than significant:

1) On page 10-3, it states that "existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 Ldn or dB)". However, this is wrong because the only measurements that exceed 70 dB at any of the 4 monitoring sites are Lmax measurements, which is fundamentally different from the Ldn measurement for the average noise level over 24 hours.

a. In other words, this statement incorrectly compares the occasional peak Lmax noise levels (e.g. honking car horn on Hwy 1) with *average noise level over 24 hours* that Ldn is intended to quantify.

2) It is unrealistic for Impact 10-1 to claim that the additional noise from crowd cheering, foot stomping, marching band and PA system would be less than significant. Common sense, real world experience and scientific studies clearly suggest the expected increase would be very significant. For example, it is well known that football game noise levels are significant:

a. College football games with Lmax of 107-112 and Leq of 94-97:

<https://www.caohc.org/updatearticles/spring2015.pdf>

i. This study found that: "The measured peak levels are 25-30 dB higher than the equivalent SPL, and 10-15 dB higher than the maximum slow, fast, or impulse integrated levels."

b. High school game noise levels with peak/Lmax over 80dB: <https://nonewstadium.org/noise-levels>

i. This study found that: "Measured sound levels (A-weighted, fast response) were up to 81.6 dB from the PA, 72.4 dB from the band, 68.4 dB from the cheer squad, and 80.9 dB from the crowd."

c. The correct comparison would be to separately measure and compare both the peak (Lmax) levels and the average (Leq) noise levels of a large event (e.g. Friday night football game).

3) The noise data from the Visalia HS football game is insufficient and incorrectly applied:

a. It is insufficient to use a single HS game as an example, especially when there are significant differences between the two sites (topology) and there are other studies available on football games that conclude much higher noise impact than in this RDEIR.

b. The RDEIR fails to provide the specific data points from the Visalia example, which makes it impossible to properly analyze or compare these results.

c. Appendix I claims the average Leq noise levels at the Visalia game are stated to be “approximately 60-66 dB Leq”, which is considered “loud” in the Appendix B sound level chart and would significantly increase the average noise level of all 4 measuring sites:

- i. 60-66 Leq is significantly higher than the entire Leq range measured at LT-1 (29.9-53.8 dB) and LT-3 (32.5-49.2 dB)
- ii. 60-66 dB Leq is at the very upper end of the range measured at LT-2 (35.5-65.5 dB) and at LT-4 (44.6-62.4 dB), which means that these locations will hear loud noise levels sustained for much longer periods than they do currently.

First, based on the above, it would seem that the noise analysis in the RDEIR is inaccurate due to selective bias of the data, and needs to be redone with additional data from multiple studies, instead of cherry-picking a single questionable data point (from Visalia HS). In contrast, multiple studies (such as the ones provided) have shown that football games significantly increase the noise levels, with high school games regularly exceeding 80 dB.

Second, the RDEIR needs to compare equivalent values, instead of comparing Lmax to Leq, as called out above. For example, the 24-hour average Ldn noise level needs to be calculated for all measuring sites, when comparing to the County’s noise exposure standards, instead of using the Lmax measurements from these locations. Also, even the RDEIR admits the L90 noise levels currently measured for all measurement sites are between 28.5 (LT-1 lowest) and 55.4 dB (LT-4 highest), which is well under the County’s exposure standard of 70 Ldn.

Third, the Visalia HS game example improperly equates a range of 60-66 Leq with the much lower Leq levels measured at all 4 measuring sites, where 2 of the sites were completely and significantly lower, and the other 2 sites were predominantly lower (i.e. most of the measure Leq range was much lower than 60 dB). This is a false equivalence and the RDEIR needs to acknowledge that even this questionable data point (which doesn’t match the significantly higher measurements in other studies) means the average, sustained noise level will be significantly increased from current levels.

--The Save Carmel Team

<https://savecarmel.org>

## Response to Letter 194g, The Save Carmel Team

1. This comment letter is regarding the noise analysis. Regarding existing traffic noise, noise associated with a game or event at the stadium, and the data used from the Visalia High School football game. See responses to Letter 2b, comment 3, as well as responses to Letter 58b, Letter 72j, and Letter 72k.

From: **Save Carmel** <[getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org)>  
Date: Mon, Oct 10, 2022 at 4:18 PM  
Subject: RDEIR comment: failure to identify mitigations for noise  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>  
Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

1 | [RDEIR fails to identify mitigations for noise](#)

The RDEIR fails to identify noise during large games/events as having a significant impact (despite preponderance of evidence to the contrary), and thus it then fails to identify any mitigation measures.

We have submitted evidence in our other submitted comments to counter the RDEIR's claim that noise will be less than significant. While the exact amount of this increase may be subject to debate, the RDEIR should acknowledge the simple statement that large football games will increase noise levels to some extent, which is a very reasonable expectation, and thus, it would be necessary and fair for CHS to implement mitigations to reduce this impact.

Specifically, the RDEIR needs to consider all of the following mitigations, which would cumulatively have a measurable reduction on the noise impact:

- 1) Noise shielding, such as [Acoustiblok fencing](#)
- 2) Distributed multi-zone PA system
- 3) Policy to prohibit all noise makers, e.g. air horns, megaphones, etc"

--The Save Carmel Team

<https://savecarmel.org>

## Response to Letter 194h, The Save Carmel Team

1. This comment is about the level of the noise impact and mitigation measures. The commenter asserts that the RDEIR should acknowledge the simple statement that large football games will increase noise levels to some extent. Section 10.0, Noise in the RDEIR does conclude there would be noise impacts associated with an increase in traffic and stadium noise. The RDEIR includes the following conclusions:

Impact 10-1. Project-generated traffic would occasionally increase existing noise levels, but the increase would be less than significant because the noise levels would not exceed the County of Monterey's noise standards. Therefore, no mitigation is necessary.

Impact 10-2. Nighttime stadium events, activities associated with the two new campus parking areas, and traffic control measures would cause an occasional noise increase, but the increase would be less than significant because the noise levels would not exceed the County of Monterey's noise standards. Therefore, no mitigation is necessary.

Impact 10-3. Construction activities could cause a substantial temporary noise increase, and that increase could be significant. However, a mitigation measure was identified to reduce the impact to a less-than-significant level. Please refer to further discussion in Section 10.0, Noise, of the RDEIR.

Impact 10-4. Construction Activities Could Cause Temporary Groundborne Vibration, but the increase would be less than significant because the noise levels would not exceed the Caltrans' standards, as the County of Monterey has no standards for groundborne vibration. Therefore, no mitigation is necessary.

Impact 10-5. Existing neighborhood noise associated with students and spectators parking in the surrounding neighborhoods would decrease with construction of new parking areas and implementation of the traffic management plan. This impact was determined to be beneficial and no mitigation measures are necessary.

Additionally, see responses to Letter 2b, comment 3, as well as responses to Letter 58b, Letter 72j, and Letter 72k. No changes to the RDEIR are necessary.

From: **Save Carmel** <[getinvolved@savecarmel.org](mailto:getinvolved@savecarmel.org)>

Date: Mon, Oct 10, 2022 at 4:19 PM

Subject: RDEIR comment: Mitigation Measure 5-2a: practice usage is too broad, as it has no restrictions on which days lights are allowed for practice.

To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

Cc: <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>

1

Mitigation Measure 5-2a: practice usage is too broad, as it has no restrictions on which days that lights are allowed for practice.

The lights are only intended to overcome late start impact to practice, so lights for practice should only be used to maintain the same practice times prior to late start. This is especially critical given the lighting impacts are Significant and Unavoidable.

As such, all of the following restrictions need to be applied to practice usage:

- 1) No lights on weekends for practice or any other uses
- 2) Require a significantly lower intensity lighting level for practice. The RDEIR punts on this by saying “the Illuminating Society of Engineers does not provide lighting standards for reduced levels for practices” but that is not an acceptable excuse, given the significant impact of these lights and the excessive frequency that practice will take place.
- 3) No lights on weekdays for practice later than 1 hour after sunset (as determined by the sunset table in Appendix D)

--The Save Carmel Team

<https://savecarmel.org>



## Response to Letter 194i, The Save Carmel Team

1. This comment is about Mitigation Measure 5-2a which restricts the number of games, and the times of games and practices at the lighted stadium; restricts use of Carmel High School stadium and pool facility by non-school related groups after dark; reduces the intensity of existing lighting at the campus that is visible off-campus; and obtain International Dark-Sky Association's (IDA) Community Friendly Sports Lighting Program certification.

The commenter requests additional restrictions and this request is noted. The school district can agree to no practices on Saturday and Sunday nights. This change has been made in Mitigation Measure 5-2a. See Section 3.0, Changes to the Revised Draft EIR, in this final EIR. With respect to dimming, please also see response to Letter 2b, comment 2.

The school district cannot agree to lowering the intensity of lighting for practice. The school district has consulted with several other high schools who have recently installed stadium lighting and none are lowering lighting intensity for practice. These include Mountain View High School, Los Altos High School, Seaside High School, Rancho San Juan High School, and West Park High School. Additionally, the school district cannot agree to limiting practices to just one hour after sunset.

From: <[jbenya@benyaburnett.com](mailto:jbenya@benyaburnett.com)>  
Date: Mon, Oct 10, 2022 at 4:45 PM  
Subject: RE: [savecarmel.org](http://savecarmel.org)  
To: <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>, <[tknight@carmelunified.org](mailto:tknight@carmelunified.org)>, <[dpaul@carmelunified.org](mailto:dpaul@carmelunified.org)>, <[tarthur@carmelunified.org](mailto:tarthur@carmelunified.org)>, <[shinds@carmelunified.org](mailto:shinds@carmelunified.org)>, <[snachbar@carmelunified.org](mailto:snachbar@carmelunified.org)>, <[kpallastrini@carmelunified.org](mailto:kpallastrini@carmelunified.org)>, <[arosen@carmelunified.org](mailto:arosen@carmelunified.org)>  
Cc: Charlie Wahle <[charliewahle@gmail.com](mailto:charliewahle@gmail.com)>, <[zancan@aol.com](mailto:zancan@aol.com)>, <[peter@dpr.com](mailto:peter@dpr.com)>, <[larry@mntools.com](mailto:larry@mntools.com)>, <[ssubhashmenon@gmail.com](mailto:ssubhashmenon@gmail.com)>, Brenda Gonzalez <[brenda.gonzalez@alphanext.com](mailto:brenda.gonzalez@alphanext.com)>, Tiffany Scarborough <[tiffany@tpscarborough.com](mailto:tiffany@tpscarborough.com)>, Robert Kahn <[robert.kahn@alphanext.com](mailto:robert.kahn@alphanext.com)>, Will <[lilbilchow@gmail.com](mailto:lilbilchow@gmail.com)>, <[jbenya@benyaburnett.com](mailto:jbenya@benyaburnett.com)>, <[Deborah@benyaburnett.com](mailto:Deborah@benyaburnett.com)>

Ladies and Gentlemen,

I have been asked to render a professional engineering and lighting expert opinion regarding the proposed sports lighting project for the stadium at Carmel High School on behalf of community members concerned about the project and its impacts on the community. My report is attached for your review and consideration.

Best,



**Jim Benya**

DESIGN SERVICES INC. DBA  
**BENYA BURNETT CONSULTANCY**

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**Principal Illuminating Engineer and Lighting Designer**

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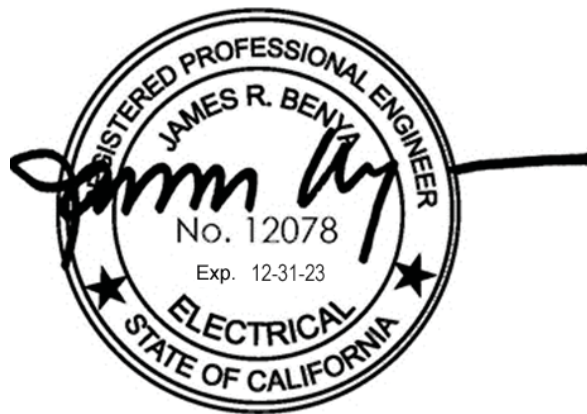
Regarding the  
Carmel High School Stadium Improvements  
Revised Draft Environmental Impact Report (DEIR)  
Dated August 22, 2022

## Lighting Expert Review and Commentary

DESIGN SERVICES INC./DBA  
**BENYA BURNETT CONSULTANCY**  
Davis, CA

Consultants to Carmel Friends and Residents Against CHS Stadium Lights *aka Save Carmel*

October 10, 2022



## Preface

The Revised Draft Environmental Impact Report (DEIR) dated August 24, 2022, provides an acceptably thorough explanation of the entire Project including important sub-projects that together will seek to modernize and improve the lighting and lighting conditions of the campus exterior and provide a best-in-class sports lighting system for the Carmel Football Stadium. However, this commentary reply is intended to address the concerns of our clients and their members regarding the DEIR and its failure to consider topics vital to their concerns. These include the biological, environmental and viewshed impacts potentially caused or exacerbated by the proposed sports lighting of the Carmel High School Stadium lighting and related lighting improvements and additions to surrounding access areas within the sports complex vicinity.



The photograph above illustrates the intent of the proposed project, to light the stadium without affecting the community or neighboring properties and people and without significantly affecting the character of Carmel and the California Highway 1 corridor. The photograph below is of a similar installation illustrating a likely occasional outcome based on our professional experience given other similar coastal sports facilities subjected to coastal marine layer and prevailing fog conditions.



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con't.

Our commentary and mitigation recommendations are topical for the role of lighting and how, using best practices, proper equipment, and lighting control timing and date restriction governances, would prove to be an acceptable and minimally invasive lighting project without undue cost or cause greater concern for the environment, human wellbeing, and community character. This report also identifies pitfalls of the DEIR in which it only partly considers the effect of lighting on the charming and naturalistic character of Carmel, as well as potentially impact the health and wellbeing of nearby residents and native species who call this section home. The negative impacts we identify will be especially notable for direct and indirect light trespass and view for residents and species habitats West of the stadium complex and within a ¼ mile radius. Additionally the DEIR fails to fully identify the crepuscular foraging activities and habitat selection viability of numerous species and the impact upon the noise abatement quality of nearby cypress trees. Our concerns are especially notable during late fall, winter, and early spring when the naturally darkened night sky is most pronounced in the late afternoon and early evening.

Furthermore, our commentary is predicated upon the universally accepted Five Principles of dark sky stewardship issued by the joint effort of the International Dark Sky Association (IDA) and the International Illuminating Engineering Society (IES). As stated as a target for DEIR, our comments and recommendations are directed to and support a successful project that will receive appropriate IDA certifications.

Above all else, in a Joint Publication of IES and IDA identified the Five Principles for Responsible Outdoor Lighting that will serve as a guiding light. Used elsewhere in this report it will be referred to as “5 Principles”.

**LIGHT TO PROTECT THE NIGHT**  
Five Principles for Responsible Outdoor Lighting





<b>USEFUL</b>		<p><b>ALL LIGHT SHOULD HAVE A CLEAR PURPOSE</b></p> <p>Before installing or replacing a light, determine if light is needed. Consider how the use of light will impact the area, including wildlife and the environment. Consider using reflective paints or self-luminous markers for signs, curbs, and steps to reduce the need for permanently installed outdoor lighting.</p>
<b>TARGETED</b>		<p><b>LIGHT SHOULD BE DIRECTED ONLY TO WHERE NEEDED</b></p> <p>Use shielding and careful aiming to target the direction of the light beam so that it points downward and does not spill beyond where it is needed.</p>
<b>LOW LIGHT LEVELS</b>		<p><b>LIGHT SHOULD BE NO BRIGHTER THAN NECESSARY</b></p> <p>Use the lowest light level required. Be mindful of surface conditions as some surfaces may reflect more light into the night sky than intended.</p>
<b>CONTROLLED</b>		<p><b>LIGHT SHOULD BE USED ONLY WHEN IT IS USEFUL</b></p> <p>Use controls such as timers or motion detectors to ensure that light is available when it is needed, dimmed when possible, and turned off when not needed.</p>
<b>COLOR</b>		<p><b>USE WARMER COLOR LIGHTS WHERE POSSIBLE</b></p> <p>Limit the amount of shorter wavelength (blue-violet) light to the least amount needed.</p>



## 1 Introduction

This report is a critical technical review of the Draft Environmental Impact Report (hereinafter “DEIR”) regarding a proposed lighting system for the Carmel High School Stadium Lights, SCH# 2021050293, and related minor projects prepared for the Carmel Unified School District (CUSD) by EMC Planning Group, dated August 10, 2021, and as revised August 24, 2022. This report has been commissioned by Carmel community members organized as **Carmel Friends and Residents Against CHS Stadium Lights aka Save Carmel** and its contents are limited to lighting and dark sky matters including biological and habitat concerns caused by or impacted by Anthropogenic Light At Night (ALAN) for human and other species.

The DEIR is a 394-page document covering many topics, assessments, opinions, and responses to comments of the revised DEIR of August 24, 2022. In consideration of the private funding for this report, our report and comments are limited in scope and supporting documentation and is based solely on the August 2022 DEIR and is geographically limited to the Carmel High School site and nearby environs for lighting related matters and dark sky impacts including the impacts on native species, humans and viewshed. If an alternate site or project scope is ultimately selected, comments contained herein will not necessarily be valid and a reassessment will be necessary.

## 2 Background of Commenter

Design Services, Inc. dba Benya Burnett Consultancy is a Davis, CA based consulting practice with expertise in the field of lighting and illumination. Principal Engineer James Benya, PE is the primary author of this work. He has served as an expert consultant on athletic field projects throughout the United States with emphasis on the Pacific Coast states and British Columbia for over 22 years. Mr. Benya is a former member of the Board of Directors of the International Dark-Sky Association (IDA), a former chairman of the IDA technical committee including leading the development of its Criteria for Community-Friendly Outdoor Sports Lighting, and co-Chairman of the Joint Illuminating Engineering Society (IES) and IDA Task Force for a Model Lighting Ordinance. He is a Fellow of the IES (FIES), a Fellow of the International Association of Lighting Designers (FIALD) and a registered Professional Electrical Engineer (PE) in California.

## 3 Format of Comments

Like this paragraph, our opinions will generally be in blue. This report adhered to the best of its ability within practical limitations employing the phrases, abbreviations and acronyms contained under DEIR Section 1.6 Terminology as they are explained therein. We refer to the International Dark-sky Association as “IDA”, and the Illuminating Engineering Society as “IES”. Finally, in discussing outdoor lighting, we will sometimes refer to it as Anthropogenic Light at Night or ALAN.

## 4 Section 2 – Summary of Proposed Project

The Proposed Project will include all areas requiring lighting:

- Stadium field lights atop poles mounted between 70 and 80 feet above grade
- A new storage building and observation deck
- New parking area east of the pool
- New parking lot in place of the existing tennis courts, and driveway improvements
- Replacing swimming pool lights with LEDs

## 5 Section 2.3 - Summary of Significant Impacts and Mitigation Measures

### Aesthetics

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#### MITIGATION MEASURE 5-2a statement

3 “New lighting would result in light pollution and the new sources of light and glare would be visible from and towards the County-Designated visually sensitive and highly sensitive areas and slightly modify the visual character and quality of site.”

#### Comment

The impacts will be significant and will affect all areas of Carmel within a ¼ mile or more, especially when enhanced by fog. We think that the DEIR did not adequately consider the elevation of nearby residential areas, marine layer impact and other species biological and activity response to the intrusive light. The mitigation efforts recommended in the DEIR are not sufficient to mitigate the concerns unless additional lighting detail and constraints are supplied, and timing restrictions are considerate of crepuscular activity and the mitigation for need light trespass onto neighboring properties and the commercial residential retirement facility.

#### Further Comment

The recent history of sports lighting is marred by metal halide lighting which almost always results in glare, and moreover, is not dimmable. Color quality and beam control are also problems with metal halide, and there is little wonder why the swimming pool lighting is considered a significant problem. Dimming (modulating) the light level is a tool only for LED lighting, and this is a mitigation measure for both the stadium and the pool with considerable potential. The DEIR is silent or very limited on using dimming to mitigate the impact of the lighting except for Mitigation Measure 5-2c (below) where it is not properly presented. Dimming of lighting and lower (warmer) color temperature light sources must be used for both the proposed sports lighting (3000 K) and the additional support areas lighting (2200 K) in order to minimize the view, visual and environmental impact. **NOTE this also applies to ALL OTHER exterior lighting within the high school campus and sport field complex.**

### Alternatives

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4 There are 5 project alternatives for which no stadium lights would be used at this school. These alternatives were also discussed in our involvement in the Monterey High School project. Since this report is primarily concerned with lighting for the existing Carmel High School stadium, the alternatives such as other sites are not discussed herein. This report is therefore limited to the “base” project with proposed mitigation measures. However, based on my experience and knowledge of the area, from an environmental and viewshed protection point of view **not lighting** the stadium should be strongly considered if at all possible.

### Mitigation Measures (summarized)

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#### Mitigation Measure 5-2a

5 (6) football games ending at 9:30 pm and (38) field sport games ending at 7:00 pm. Lights remain on for ½ hour after game end.

#### Comment

There are specific periods when lights after sunset would negatively impact certain species especially those which are defined as crepuscular. Differing from humans which are diurnal (wake in day, sleep at night) these species are active, hunt, gather and feed primarily during the early evening hours and are vitally important to the naturalist quality, character, and various species environmental success. Avoiding undue bright direct or indirect light during this time period is sufficient to pose a significant impact on a number of species including barn owls, bobcats, Hoary Bats, possums, nesting raptures and most insects a

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con't. primary food chain provider. The most critical period to avoid ALAN is after Civil Twilight during pre- and post-winter solstice which is discussed later in this report.

**Mitigation Measure 5-2b**

6 Restrict the use of stadium and pool to non-school related activities to day-use only.

**Comment**

Allowing non-school activities opens the door to night activities as we have seen in other communities. Maintaining the schedules reviewed herein with our comments is tantamount to mitigating opportunistic community uses of the lighted stadium.

**Mitigation Measure 5-2c**

7 Consult with an energy specialist how to reduce the intensity of the lighting for the event.

**Comment**

Energy specialists are not lighting experts. Also, see comments about dimming throughout. Unlike legacy lighting equipment (i.e. the pool) lighting should ALWAYS be dimmed to the recommended level, where the typical levels may be less than full, and many recommended levels are much lower. A detailed recommendation is contained later in this report.

**Mitigation Measure 5-2d**

8 Obtain IDA Community Friendly Sports Lighting Certification for the combined pool lighting (as replaced/fixed) and the new football lighting.

**Comment**

From community member input, it appears that the pool lighting is poorly designed and simply converting it to LED could result in a poorly designed LED installation. Light levels will need to be changed to Class III (see Stadium Improvements). If designed properly, Measure 5-2d should be obtainable. But first, good design must be done. The stadium lighting is likely to cause light trespass levels on the due west and east-by-southeast directions onto residential properties and potentially not comply as discussed herein. This is in part due to the properties being within 150 feet of the track portion of the field, and especially on the east side, the elevation changes onto adjacent properties wherein the adjacent properties may be 15 to 30 feet lower than the field level. Receiving the IDA certification should be considered a minimum mandatory achievement.

**Mitigation Measures related to Special Status Species and Noise**

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**Comment**

Stating that the mitigation measures will be sufficient to offset any harm to special status species is representative of a failure to understand the impact of direct and indirect ALAN on species reproduction, foraging, nesting, migratory selection patterns, and other considerations vital for epigenetic and biological success. All recommendations herein represent to the best of our knowledge current science and best practices.

10 **6 Section 2.5 - Areas of Known Controversy**

**General**

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With regard to lighting, all of the relevant issues are consistent with our concerns.

## 7 Section 3 - Environmental Setting

### General

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The following points are noted as relevant to our review.

- a) There are residential properties within 50 yards (150 feet) of the stadium on its west and east sides, as defined as the distance from any part of property to the field and its surrounding track.
- b) The CUSD apparently replaced existing outdoor lighting with LED with 2016. We are concerned that like many LED replacement lighting projects, this was performed with high color temperature (bluish) LEDs and no attempt at glare control.
- c) There is considerable use of the stadium including football, lacrosse, field hockey, track and field and soccer throughout the year. With the exception of junior varsity and varsity games, the existing schedule of activities generally ends at sunset or 5:00 pm. The schedule is quite full with 350-420 practices and 74-124 games per school year. The reason for a range is not explained.
- d) Off-site and “super site” games currently allow for night games.
- e) On-campus parking was assessed its deficiencies are being addressed in the proposed project. Off-campus (overflow) parking occurs on nearby residential streets. The streets are not lighted except for lighting on private property, if at all.

## 8 Section 4 - Project Description

### Project Objectives

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Aside from objectives related to the purposes of the proposed project, the implementation of “green building” practices (sic) and in particular, to “...replace outmoded athletic lighting fixtures with new fixtures that will obtain dark sky certification” stands out as a clear goal of the Project. The limitation is to “achieve these objectives within the District’s allocated budget allowances.” There is no discussion concerning where dark sky principles lie in the hierarchy of funding. If the specified lighting inclusive of the recommendations we provide are “value engineered” or substituted in any way, **the entire project will risk becoming a failure in all respects and will unfortunately realize the concerns of the stated purpose of the DEIR and the concerns of our Clients.**

### Project Characteristics

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The Project consists, in order as presented, of:

- Stadium field lights;
- New 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.

## Stadium Improvements – Stadium Field Lights

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### Statement

The proposed Stadium lights are Musco LED consisting of fully shielded downlights with 70- and 80-foot poles. In addition, aerial ball uplights are mounted about 25'-6" above ground. Different mounting heights are used to adapt to topography. Total maximum power is about 75 kW. Light levels on the field of play are a minimum of 43 foot-candles and a maximum of 61 foot-candles with an average of 52 footcandles, for a max:min ratio of 1.47.

### Comment 1

Based on recommendations contained in IES RP-6-20+E1 (current edition) the stadium is High School Class III (3) based a spectator capacity of 2,000 or less. IES recommends the following *maintained* light levels based on the sport and high-school level of play.

Football	30 foot-candles average horizontal @ 3' with CV=0.21
Soccer	Same as football
Lacrosse	Same as football
Field Hockey	Same as football

When there are no or limited spectators, the facility is considered Class IV and lighting levels should be reduced 33% (IES recommendations are 2/3 of Class III.)

Allowing for a light-loss factor of 0.825 for LED lighting and limited annual operating hours, the lighting system should be designed for 36 initial footcandles, not 52. This will reduce the power of the lighting system to about 52 kW, with significant first cost and energy savings as a result. When dimming is used for Class IV the reduced light level will reduce environmental impact and save 1/3 of the energy.

### Comment 2

No mention of the color temperature of the lights is present. Based on the IES and the IDA 5 Principles, **the color temperature of the lights should be 3000K or less.** It is highly likely that Musco will argue that 5700K is their standard for a number of reasons. But because lower color temperatures reduce the impact of light at night, the CUSD should set a policy for 3000K or lower for all outdoor lighting including the Stadium Field Lights. It is understood that the lighting power may increase 10-20% to do this, a small price to pay for the reduction of environmental impact and for the improved appearance of the lighting.

### Comment 3

13 As a general rule, taller poles have the advantage of being aimed downwards better than shorter poles, that combined with good optics will minimize off-site light trespass. The proposed pole heights are consistent with IES recommended practices and Musco's proven experience.

### Comment 4

Musco employs uplights mounted at 20 to 30 feet above ground for aerial ball lighting. These should probably only be used for football.

### Comment 5

**Do not value engineer or substitute the stadium lighting system. In my opinion it currently has no equal.**

## Storage Building

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No comments.

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con't.

## New Parking Lots

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### Statement

No additional lighting is required for this new parking area.

### Comment

In keeping with the 5 Principles, all existing lighting should be replaced with fully shielded 2200K LED lighting and should be controlled using motion sensors except during events.

## Replacement of Existing Pool Light Fixtures

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### Statement

According to the DEIR, the design of the lighting for pool has been submitted and received approval from IDA.

### Comment

Please refer to comments above under Mitigation Measure 5d.

## Lighting Schedule

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### Statement

Table 4-2 presents a proposed operating schedule of the Stadium uses after lights are installed. With the exception of games, Fall Sports will generally end by 7:45 pm; Winter Sports will end by 7:15 pm; and Spring Sports will end by 7:45 pm. Games requiring lights are limited to Varsity Football, 4-6 per year until 10:00 pm.

### Comment 1 - Biological Negative Impacts

Since 2002 peer review research across various field of study has documented negative biological impacts for living beings with exposure to anthropogenic light (ALAN) during the normally darkened evening hours. Negative biological impacts currently identified include neuroendocrine asynchronization, carcinogenic etiology, and negative species-specific reproductive viability and population. In humans, research supports a correlation with ALAN exposure and hormonal cancers, inappropriate immune response, sleep and circadian desynchronization, obesity, and cardiac comorbidities. Due to the current viewshed (the natural environment adjacent to the Carmel High School complex) we surmise the potential for both human and other life forms to have far reaching negative biological impacts attributed to increased ALAN directly attributed to the sports complex increased light levels and expected additional usage opportunities throughout the calendar year. Because of the dynamic nature of the proposed lighting and its intermittent widespread disbursement via marine layer diffusion it is not unexpected to negatively impact specific species including Hoary bat nesting preference and population distribution, disruption of barn owl evening foraging activities and nesting preference, and major disruption of crepuscular foraging activities and home range preference for Bob cat, possum, and fox populations.

Specifically, for the ¼ mile vicinity surrounding the football stadium complex, any increase to the existing ALAN light levels during early evening (civil twilight) and complete later (nautical and astronomical twilight) hours would be cause for biological and wellbeing concern for residential pre and post-menopausal women and elderly occupants of the retirement center. Additionally, the proposed lighting would likely cause nesting songbird eggshell fragility, disruption or abandonment of existing raptor home range and nesting preferences, inappropriate bud release of flowering trees, and potential increase of disease and decrease of foliage distribution for nearby cypress trees which are currently valued for their sightline and noise-abatement protective qualities. In consideration of citizenry demand for early evening and nighttime sports, social, and related use of the sports complex lighting, our recommendation specific for biological and environmental habitat protection concern is to restrict operation of all proposed, future, and specialty sports field and surrounding complex lighting during the three to four weeks prior to and after the winter solar solstice. The impact would most likely occur in the



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con't. | month prior to and the month following the winter Solstice, or in other words from November 15 to January 15, and during which lights must be extinguished by the end of civil twilight which is about 5:30 pm to preserve critical time periods for affected species.

15 | **Comment 2 - Operational Concerns**

Our firsthand experience with serving on stadium lighting projects as experts has included a dozen projects in the past fifteen years. Our work has included every level from middle school to professional sports stadiums. Three following projects demonstrate the long-term challenges of sports lighting for high schools.

At Hoover High School, the San Diego Unified School District promised homeowners that because the schools were built in close proximity to homes, stadium lights would never be installed. A number of years later, lights were installed anyway. Using Musco last generation systems, light trespass onto residential properties was measured at over 2 foot-candles, well in excess of the limits of today's standards. The reason was proximity, unfavorable topography and lack of a substantial buffer zone, and because of this the installation could not meet IDA Criteria for Community Friendly lighting. The stadium lights changed the character of the neighborhood dramatically. Our role was to take measurements of the amount of trespass and serve as an expert for litigation brought by the homeowners.

This DEIR appears to promise on behalf of CUSD to limit operating times to 7:45 pm or earlier with the exception of only 4-6 varsity football games per year, which would end at 10:00 pm. This is similar to the mitigation measure employed by San Marin High School (Novato USD) for its recently lighted stadium, except they limit their night games to only 4 this year. Our role in that project was to certify that the design met the criteria contained in the DEIR and FEIR, and to testify in legal proceedings brought by local property owners. It is a Musco lighting system project very similar to the proposed Carmel High installation. Its primary difference was a greater distance from residences except for four which happened to be about 50 feet higher in elevation than the field. San Marin's 2022 varsity home schedule includes 3 games at 7pm and 2 games at 2pm (Saturday and late November) and includes other functions very similar to that proposed for the Carmel High project. A critical component of such arrangements with the community is a that they be legally enforceable as in San Diego and other parts of California, schools are using their lighted fields for community activities nightly throughout the year until well after dark.

With the dimming ability of LED lighting, Carmel High School may be able to employ lower light levels for practices in some sports, notably soccer, where light levels can generally be cut in half. Lower light levels save considerable energy and energy cost and have less community impact.

## 9 SECTION 5 – Environmental Setting

### State Route 1 Corridor, Visual Quality and Public Views and Sensitive Receptors

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#### Statement

These sections describe the appearance and nature of the Carmel High School area. The *Greater Monterey Peninsula Area Plan* designates this area as a highly sensitive visual area.

#### Comment

Community members are understandably fearful that the proposed stadium lighting will be carried out as poorly as the swimming pool lighting. They understandably assume the resulting lighting will appear as in the following image.



*Figure 1 - Light Dome from Stadium Lights, location, photographer and lighting system unidentified. Apparently conventional metal halide lighting due to poor shielding and cold white color. The elevation of the clouds plays a critical role in where the appearance of greatest brightness exists. A fully shielded lighting system **will not** create this type of light pollution.*

It is important to consider the impact of the marine layer or coastal fog and its relevance to this Project. According to community residents, they believe that with climate change, the frequency of and intensity of moisture-laden air will increasingly play a significant role in what is illustrated here that is antithetical to the nature of the community and the region. Like the existing swimming pool, in Figure 5 poorly designed outdoor lighting spills a significant percentage of its cold, bluish tinged output upwards and into the marine layer's low hanging clouds. This outcome is unacceptable.

However, in all fairness Musco systems are different and better. Turn off the uplights (they will not be needed when there is fog) and while the sky dome will still be created, its impact will be more localized, and it will not light the clouds above as brightly. It will also be less harsh if our recommended 3000K light sources are employed. Because the light dome is caused by Mie Scattering in the moisture laden air, the lower color temperature of the light will not reduce its brightness, but it will likely be seen as less impactful.

## 10 Summary

We are familiar with the site and how it relates to the community of Carmel by the Sea. And while we agree that the stadium lighting will disrupt the serenity of the area adjacent to the High School, with careful design of all new lighting and replacement of all existing lighting with low color temperature sources the result will be at least marginally acceptable from an aesthetic and environmental point of view. But it will still nonetheless affect the adjacent neighborhoods, especially on nights when the marine layer is dense. **Mitigation measures including limited operating hours, warm toned and fully shielded lighting that is dark sky certified, and reduced lighting levels as described in this report are tantamount.**

Sadly, if these recommendations and the operating promises are forgotten and the project is awarded to the lowest bidder using cheaper equipment, the outcome will likely become a big version of the current swimming pool lighting, an eyesore that disrupts the Highway 1 corridor and the surrounding homes and businesses. **Modern lighting technology is different than legacy lighting equipment and should not be assumed to be “off the shelf” or commodity in any way.**

## 11 Appendix and Notes

### Photograph Credits and Notes

(First page top) Niwot High School Football Stadium, Niwot, Colorado, USA (Musco) - A fully shielded high school football field lighting system with aerial-ball uplights, very similar to the proposed lighting system for Carmel High School except using 6 poles instead of 4 as proposed for Carmel High School. More poles increase cost but allow for shorter poles. Note that this is a clear air night with no diffusion of light above the field.

(First page bottom) A Musco system in marine layer fog (photographer unknown, project unknown) can be recognized by uplights mounted to the pole about 1/4 to 1/3 of the way up. Mie scattering of light is evident. The resulting light dome will be lower and less obvious than Figure 5, but it will occur occasionally and affect nearby residents.

## Response to Letter 195, Jim Benya, Design Services Inc., DBA Benya Burnett Consultancy

1. This commenter is a registered professional electrical engineer and consultant to Carmel Friends and Residents Against CHS Stadium Lights *aka Save Carmel*. This first comment is a preface or summary of the issues that will be raised in the letter, focusing on biological, environmental and viewshed impacts. This summary includes two photos. The first is of a lighted stadium at Niwot High School in Colorado on a clear night. The commenter asserts that this design is similar to that proposed at Carmel High School, noting some differences. The second is of an unidentified stadium on a foggy night. Stadium lighting projects at other high schools are not the subject of the RDEIR. This introductory comment does not include any environmental issues that are not addressed in the following response.

This comment also includes a chart that is identified as the “Five Principles for Responsible Outdoor Lighting” as identified by the Illuminating Engineering Society (IES) in conjunction with the International Dark-Sky Association (IDA). As discussed in Section 4.0, Project Description, and starting on page 5-62 of Section 5, Aesthetics, of the RDEIR, in October 2021, the school district submitted the proposed Carmel High School stadium lighting design for Dark Sky certification and received design analysis (Phase I) approval from the IDA on October 27, 2021. The LED light pool light fixture designs were also submitted to the IDA and received design analysis approval for Dark Sky certification on July 29, 2022. The Lighting Performance Summary Results provided by IDA in evaluating the proposed stadium lighting and pool lighting designs, which required a consistency review with the IES “Five Principles for Responsible Outdoor Lighting,” are included as Appendix D of the RDEIR. IDA’s “Community Friendly Outdoor Sports Lighting” program guidelines are consistent with the Five Principles. In addition, a mitigation measure (5-2d) was included in the RDEIR, which required that the school district have the stadium and pool lights professionally evaluated and validated as confirming to the IDA’s Community Friendly Sports Lighting Program (Phase II – Field Verification).

While the IES Five Principles do not specifically address sports field lighting, the proposed project is consistent with or addresses these five principles in the following ways:

- **First Principle (Useful – All Light Should Have a Clear Purpose).** The clear purpose of the proposed stadium lights is to illuminate the existing playing field at Carmel High School to allow for after dark practices and games. In addition, consistent with this principle, the school district, through its environmental review process and impact analysis contained in the RDEIR, has carefully considered how the use of the stadium lights will impact the surrounding area, including wildlife and the environment. The alternate considerations referenced under this First Principle (using reflective paints or self-luminous markers for signs, curbs, and steps to reduce the need for permanently installed outdoor lighting) are not applicable to the proposed project.

- **Second Principle (Targeted – Light Should be Directed Only to Where Needed).** As shown in the lighting designs provided in Appendix C of the RDEIR and discussed in Section 5.0, Aesthetics (under Impact 5-2 on page 5-41), light fixtures would be designed to direct light downward to minimize light trespass (see also Figures 4-2 and Figure 4-3 found in Section 4.0, Project Description, of the RDEIR for further light pole design details).
- **Third Principle (Low Light Levels – Light Should Be No Brighter Than Necessary).** As previously addressed in responses to Letter 2b, comment 2, and response to Letter 14-6-u, comment 2, the lighting standards that are professionally recommended by IES will be employed for both games and practices by the school district.
- **Fourth Principle (Controlled – Light Should Be Used Only When It Is Useful).** As addressed in Section 4.0, Project Description, and Section 5.0, Aesthetics, of the RDEIR, the school district will only utilize stadium lighting for practices and games and have implemented limitations on use where feasible. The school district has identified mitigation measures (see mitigation measures 5-2a and 5-2b as amended in Section 3.0, Changes to the Revised Draft EIR, of this final EIR).
- **Fifth Principle (Color – Use Warmer Color Lights Where Possible).** As previously noted under response to Letter 132b, comment 2, the color of the lights would be that which is recommended by the Illuminating Engineers Society and Musco Sports Lighting, the lighting designer. Please also see response to Letter 5, comment 3.

Please also refer to Section 5, Aesthetics, of the RDEIR.

2. This section of the letter includes an introduction, background of the commenter, format of comments, and a summary of the proposed project. No environmental issues are raised here and therefore, no response is necessary.
3. This comment is regarding Impact 5-2, which the commenter misidentifies as a mitigation measure. Impact 5-2, page 5-40 (as well as page 2-7 of the Summary) of the RDEIR states, “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.” The impacts statement on page 5-40 of the RDEIR states that this impact is significant and unavoidable.

The commenter raises the following environmental issues in this comment: lighting impacts on residential areas within ¼ mile of more, especially when enhanced by fog; and lighting impacts on “other species biological and activity response to the intrusive light,” the design of the lighting including dimming. According to Musco Sports Lighting staff, for purposes of what is being discussed in the comment, it is not important to discern between halogen and metal halide light sources. It is incorrect to say that you cannot dim metal halide. These fixtures can be dimmed by adjusting the wattage but it is not a common practice. As for the statement related to correlated color temperature (or CCT), the IDA guidelines for community friendly sports lighting version 1.1 allow for any CCT as long as the system meets the spill, backlight, uplight, and glare requirements set forth in that document. The spill and glare requirements are what ensure reduction in impact to all surrounding areas.

Regarding lighting impacts, including sky glow impacts (lights in fog), see Section 5.0, Aesthetics of the RDEIR and response to Letter 2b, comment 2. Regarding lighting impacts on special-status wildlife species, see Section 7.0, Biological Resources of the RDEIR, as well as response to Letters 2b, comment 4; Letter 2c, comment 7; Letter 72b; Letter 131 (California Department of Fish and Wildlife), Letter 132b, comment 2; and Letter 157.

Regarding the design of lighting, see Section 4.0, Project Description (including Figures 4-2a, 4-2b, 4-2c, 4-3, and 4-4, Section 5.0, Aesthetics, and the detailed lighting specifications and exhibits in Appendices C and D, as well as responses to Letter 2b, comment 2; and Letter 14-2-6, comment 2.

4. The commenter states that he will not be commenting on the Alternatives analysis in the RDEIR. No response is necessary.
5. Regarding crepuscular wildlife species, see response to 3 above.
6. This comment is regarding Mitigation Measure 5-2b. The commenter purports that the school district can limit non-school use of the lighted field and pool. See response to Letter 65, comment 2.
7. This comment is regarding Mitigation Measure 5-2c (page 5-64 of the RDEIR), which the commenter misquotes. The measure actually reads, “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.” Consultation with an energy specialist is regarding the intensity of existing lighting at the campus, not the proposed stadium lighting. The intent of this measure is to further reduce cumulative lighting impacts throughout the campus. No changes to the RDEIR are required.



8. This comment is regarding Mitigation Measure 5-2d, regarding obtaining IDA certification. The commenter agrees with this measure. Light trespass levels are discussed in Section 5.0, Aesthetics, of the RDEIR. No response is necessary.
9. This comment is regarding mitigation measures for impacts to special-status wildlife. See response to 3 above.
10. This comment references Section 2.5, Areas of Known Controversy, of the RDEIR, but raises no environmental issues and therefore, no response is necessary.
11. This comment raises no environmental issues and therefore, no response is necessary. However, for clarification, the following should be noted regarding how the commenter summarizes and characterizes Section 3.0, Environmental Setting, and Section 4.0, Project Description, of the RDEIR:
  - Track and field events and practices will not be held at night and will not require stadium lighting (see correction made to mitigation measure 5-2a as well as the revision made to the text on page 4-22 as reflected in Section 3.0, Changes to the Revised Draft EIR, of this final EIR).
  - The commenter states the reason for providing a range of practices and games per year is not explained. A range for both practices and games is provided in Section 4.0, Project Description, to provide a minimum and maximum anticipated total of practices and games for all sports. The number of practices and games for each team can vary from year to year depending on the number of homes games or matches scheduled as well as if varsity teams make playoffs in their respective sport.
  - The term “super site” game is referenced by the commenter. According to the high school athletic director, the term “super site” is a term used in reference to multiple games held at a lighted field on one night and can include more than one school’s team for a given sport. “Super site” games are often held when there is a shortage of match or game officials and multiple schools will utilize one lighted field for multiple games in one evening as way to efficiently hold multiple scheduled games without cancelling events. This term is only referenced once in the RDEIR in Section 3.0, Environmental Setting, in Table 3-1, under Boys Lacrosse (Junior Varsity) and is only referenced as a footnote to the JV game start time with the JV Boys Lacrosse games being held offsite at “supersite” games. For clarification, the school district will not utilize the lighted stadium at Carmel High School for any “super site” games or tournaments for any sports teams. See Mitigation Measure 5-2a for the limitation on nighttime events.

- For clarification, the drive-aisle is 18-feet wide (not long), and the “20-foot driveway” is 20-feet wide (not long). Please refer to Section 4.0, Project Description, of the RDEIR.
- The comment focuses on Project Objective No. 8 as “a clear goal of the project.” Please note that all of the Project Objectives set forth in Section 4.1 of the RDEIR are objectives sought by the proposed project under CEQA Guidelines, section 15124(b). As stated in the RDEIR, the RDEIR does not reflect any priority or weight given to the objectives.
- The commenter appears to question whether the school district is capable of or prioritizes obtaining Dark-Sky certification for the proposed stadium lights from a funding standpoint. The school district is committed to completing and obtaining full Dark-Sky certification from IDA. It should be noted that the cost for on-site Dark-Sky certification is a nominal fee (\$3,000 per system).
- The commenter states that if the specified lighting inclusive of the recommendations they provide are “value engineered” or substituted in any way, the entire project would be a “a failure” in all respects. To clarify, the project is fully funded by the school district and no value engineering or substitutions are anticipated for the Musco light designs provided in the RDEIR (Appendix C).

12. Comment noted. The commenter provides their recommendations for changes in the project design. The school district has considered these recommendations and will implement a recommendation associated with dimming the stadium lights immediately after active field practice ends. This function will be pre-programed into the lighting design at the start of each season and will allow for the safe exit of coaches and players from the stadium after practices. Implementation of this recommendation has been reflected in a text change to mitigation measure 5-2a. Refer to Section 3.0, Changes to the Revised Draft EIR, of this final EIR for the recommendation language.

13. Regarding aerial ball lighting, see response to Letter 2b, comment 2. Please also refer to response to comment 7, above. To address safety and security concerns regarding having motion sensors in the parking lots, the parking lots lights would be controlled similar to other lights on site and motion sensors would not be used. None of the other comments here raise an environmental issue; therefore, no further response is necessary.

14. This comment is regarding lighting impacts to humans. The commenter asserts that lighting associated with the proposed project could cause a variety of conditions in humans, including but not limited to cancer, inappropriate immune response, sleep and circadian desynchronization, obesity, cardiac comorbidities, and unidentified impacts to pre- and post-

menopausal women and the elderly. However, the commenter, a registered professional electrical engineer, provides no evidence to support this claim. Please also refer to response to Letter 5, comment 3.

The commenter asserts that lighting associated with the proposed project would also negatively impact a variety of wildlife species. However, the commenter, a registered professional electrical engineer, provides no evidence to support this claim. As addressed in Section 7.0, Biological Resources, of the RDEIR, the proposed project could affect protected nesting birds and roosting bats during construction and mitigation measures are provided to ensure these potential impacts would be less than significant. See also response to comment 3 above.

15. This comment is a discussion about two high school lighting projects on which the commenter was employed as a consultant. The comment is generally about the lighting design for those stadiums. Past stadium lights projects at other high schools are outside the scope of the RDEIR. Likewise, purported settlement terms reached in legal proceedings against another school district are not the subject of the RDEIR. It does not raise an environmental issue about the proposed project and therefore, no response is necessary.

With respect to mitigation measures recommended in the RDEIR, the district is legally obligated under CEQA to adopt mitigation measures that are fully enforceable, and to adopt a monitoring program to ensure that the measures are implemented. (Pub. Res. Code, §21081.6; CEQA Guidelines, §15091(d).) Table 2-1 of the RDEIR sets forth a summary of the mitigation measures that are discussed more thoroughly throughout the RDEIR. These mitigation measures are feasible and legally enforceable, and will be implemented through a monitoring or reporting program adopted by the district's board if the project is approved in accordance with the requirements of CEQA.

The comment incorrectly states that use of stadium lights would be limited to 7:45 pm or earlier, with the exception of only 4-6 varsity football games per year, which would end at 10:00 pm. However, Mitigation Measure 5-2a actually states lights shall be turned off by 10:00 pm for the six nighttime football games, by 7:30 pm for the field sport games other than football (38 games), and by 8:30 pm for all field sport practices. Please refer to Table 2-1 and discussion of Mitigation Measure 5-2a starting on page 5-63 of the RDEIR.

Regarding light levels, please refer to response to comment 3, above.

No revisions to the RDEIR are necessary.

16. This comment is regarding lighting impacts. Regarding the high school's location in a visually sensitive area, see response to Letter 11b, comment 28. Regarding the marine layer or coastal fog, see response to Letter 2b, comment 2. Regarding the submitted Figure 1,

depicting a light dome from stadium lights, location, photographer and lighting system unidentified, this is not a comment on the proposed project or the RDEIR and therefore, no response is necessary. Regarding the comment about the existing swimming pool in Figure 5, the comment letter does not include a Figure 5. In general, please note that the existing swimming pool lights are a Musco system. Therefore, no response is necessary.

17. This comment summarizes the commenters concerns regarding the lighting, but no new environmental issues are raised. Therefore, no response is necessary.
18. These paragraphs are photograph credits and notes regarding the pictures in the Preface of this letter. The dates and sources of these photographs are not provided. They do not raise environmental issues and therefore, no response is necessary.

From: **Belle Yang** <[belleyang@comcast.net](mailto:belleyang@comcast.net)>  
Date: Mon, Oct 10, 2022 at 3:58 PM  
Subject: NO on CHS School Stadium Improvements  
To: <[jhull@carmelunified.org](mailto:jhull@carmelunified.org)>

1

Dear Carmel Unified School Board:

In a time of paradigm shift toward environmental protection, it seems a grand mistake to install night lights to the Carmel High School stadium that will no doubt create habitat damage to animals and human alike.

NO! to stadium improvements. The footprint of CHS has been steadily increasing and expansion must stop.

Sincerely,  
Belle Yang

## Response to Letter 196, Belle Yang

1. The commenter expresses their opposition to the proposed project, but does not comment on the RDEIR. Therefore, no response is necessary.

Please refer to Section 7.0, Biological Resources, of the RDEIR for a discussion of habitats.



From: **Aubrey Powers** <[shoppinaub44@hotmail.com](mailto:shoppinaub44@hotmail.com)>  
Date: Mon, Oct 10, 2022 at 3:07 PM  
Subject: Carmel High stadium lights  
To: [feedback@carmelunified.org](mailto:feedback@carmelunified.org) <[feedback@carmelunified.org](mailto:feedback@carmelunified.org)>

To Whom It May Concern:

- 1 Please prioritize the stadium lights project for the students of Carmel High and the community.  
This project is long overdue and will have a tremendous impact on supporting the climate and student experience for the kids. Let there be lights!

Sincerely,  
Aubrey Powers

Sent from my iPhone

## Response to Letter 197, Aubrey Powers

1. The commenter expresses their support for the proposed project, but does not comment on the RDEIR. Therefore, no response is necessary.

**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

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**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

- Include all areas of the impact from Carmel-by-the-Sea, Carmel Valley, Jack's Peak, Carmel Highlands, Point Lobos, Palo Corona, Mission Trails and Santa Lucia Preserve.
- All impacted geographies should be in Environmental Settings with details of impacts across all areas of aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, transportation and parking, soils, erosion and water quality. Please include in the cumulative impacts as well.

**Stop the surprises. This RDEIR includes significant NEW expanded construction projects.**

- Re-start community engagement with a legally required Scoping Session.
- There are no details to any of the new plans. Concepts are unstable; thus we can't provide feedback.
- We say NO to the 18-foot roadway, new parking lots and monstrous viewing platform.

**Inspire our next generation with long-term solutions versus short-term band-aids. Assess CMS as viable solution.**

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- CMS: 60-acres permitting safe and responsible planning with 400 parking spaces now!
  - Since its purchase in 1963, Carmel Middle School's site was always intended for the future Carmel High School (reference article in Carmel Pine Cone, January 10, 1963)
  - In 2018, CUSD acquired an additional 8.23-acre parcel adjacent to Carmel Middle School
  - The 2019 CUSD Facilities Master Plan already visualizes the potential of SIX (6) athletic fields with lights.
  - Dust off the Facilities Master Plan and develop a responsible phased long-term growth approach.

**Work with residents to protect their residential streets with permanent long-term No Parking Signs.**

- The proposed Mitigation Measure 11-4 of a Traffic Management Plan (TMP) does NOT shift the environmental impact to "less than significant". It is a short-term "encroachment permit" fix for limited nighttime football games.
- Don't create a Public Nuisance (Penal Code 372 & 373a PC) as residents won't be able to park on their own streets because of "No Event Parking" signs.

**Show us the existing and proposed Emergency Access Routes. Are our kids safe?**

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- From the Performing Art Center, Swimming Pool, Science Wing to the batting cages at baseball field, we can't find any record of a CEQA process or signed and filed Notice of Exemption for the public to engage in the details.

**You fail to identify noise during events as a significant impact despite evidence to the contrary?**

- Identify mitigation measures such as; Noise shielding (Acoustiblok fencing), distributed multi-zone PA system and a policy to prohibit all noise makers, e.g. air horns, megaphones, etc

**You don't disclose why you aren't repairing tennis courts. Save demolition dollars and fix them.**

- Tennis Students drive far with the Vehicles Miles Travelled and deserve on-campus courts. Easy Fix!



**Provide full and consistent disclosure on how many practices and games the light will be on.**

- Appendix J: VMT Assessment (6 football games), Mitigation Measure 5-2a: (44 games)
- BUT the truth is on page 103 with up to 400 practices and 124 games.
- Include the full impact of all the practices/games in all inputs: VMT, GHG, Energy – it's part of the cumulative impact.

**Fast-track the adoption of "Late Start", a CA State Law benefiting all students.**

- Focus on implementing Late Start by purchasing more buses and hiring more drivers.
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- Separate out this workstream. It's not a construction project and not part of the 4.2 Project Characteristics.

**Parking Capacity and Emergency Access will remain a "Significant" Environmental Impact without viable mitigation:**

- Parking: Currently not enough parking (276 spaces) for 866 enrolled students, 102 daytime faculty and staff (including kitchen staff) and five nighttime staff (page 65).
- Even with RDEIR proposed new parking spaces (total of 387), the CA Education recommended planning guidelines: 50% of students = parking spaces so minimum should be 433 parking spaces.
- Bleachers: Current bleacher capacity is 1,081 (page 57) and yet Appendix K indicates they could absorb more than 2,000 attendees? Where is the Emergency Access Routes?

**Figure 7-1: Habitat Map visually outlines which regulated/protected trees are in jeopardy.**

- RDEIR states that it "appears" to have adequate buffer space between the trees and new parking lot but they provide NO details, specs or measurements.
- Provide a clear map indicating all specs, designs and exact boundary lines of Scenic Highway 1, protected trees and any proposed roadways or parking lots.

**Accurate facts on the Environmental Setting of the existing traffic, parking and safety issues at CHS are not disclosed:**

- Why hasn't CHS already implemented what is on Page 18 of Appendix K: Traffic Management Plan:  
*The school would like to coordinate with the County and nearby neighbors of the school to consider the implementation of potential traffic safety measures that would benefit all street users. These include, but are not limited to ideas such as:*
  - *Updating required school area warning signage*
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  - *Calming traffic through use of pavement markings and/or speed reduction measures, which could potentially include additional speed humps*
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- We request that CUSD establish a baseline of a "Safe Routes to School Assessment" that acknowledges school enrollment boundary with a focus on infrastructure improvements, enforcement, tools and safety education and incentives for safe travel. This should be done immediately and outside of the RDEIR. It's basic safety.

**Mitigation Measure 11-4: The proposed Traffic Management Plan (TMP) is a superficial, flawed, short-term fix with the potential to cause residential nuisance problem:**

- Execution of TMP requires an "Encroachment Permit" granted by Monterey County. CUSD is not in control. No guarantees the County will or should consistently give permission on requested dates.
- No valid methodology or basis for establishing anticipated attendees (lack of ticket sale data across all games including soccer, football and/or baseball).
- No valid base for vehicle occurrence: data comes from one homecoming football game on a Friday night, with lights, at Mitty High School in San Jose, CA (no context of how school compares to CHS, # students, campus size, etc).
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- Install LED filters and use the lights as little as possible. Where is your usage policy?
- In a December 2021, Community Listening Session, you promised to fast track a solution – now a broken promise.

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**CC: School Board Members:**

Sara Hinds	shinds@carmelunified.org
Karl Pallastrini	kpallastrini@carmelunified.org
Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME: Valerie Bridges

DATE: 10/4/22

CONTACT INFORMATION: 408 667 4415

## Response to Letter 198, Valerie Bridges

1. See response to Letter 2c.



**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

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Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

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Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME:

Jill Warner

DATE:

10-4-22

CONTACT INFORMATION:

25285 Flanders Dr.  
Carmel, Ca 93923

## Response to Letter 199, Jill Warner

1. See response to Letter 2c.

**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
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Tess Arthur	tarthur@carmelunified.org
Anne Marie Rosen	arosen@carmelunified.org
Seaberry Nachbar	snachbar@carmelunified.org

NAME:  Edward Stryker Duggan

DATE: 10-2-2022

CONTACT INFORMATION: 25996 RIDGEWOOD RD.  
CARMEL CA 93921  
strykerduggan@gmail.com.

## Response to Letter 200, Edward Duggan

1. See response to Letter 2c.



**TO: Superintendent Ted Knight**  
**VIA: feedback@carmelunified.org**

Carmel Unified School District,  
Attn: Dan Paul, Chief Operations Officer  
4380 Carmel Valley Road, Carmel, CA 93923

1 We have serious concerns regarding your Environmental Impact Report. You are legally required to provide a complete and factual response to each of our listed comments, question and concerns.

**Show us the full impact of the light pollution on our treasured views and night skies.**

- Why limit the map to only a 3.5-mile radius on page 127/RDEIR? Show the truth of the light spill. Where is zero?
- Install story poles/balloons allowing people to see the height of the light poles and the visual impact during the day.

**Don't shrink the assessment study area to a narrow swath immediately adjacent to the high school.**

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Seaberry Nachbar	snachbar@carmelunified.org

NAME: Deanna Edwards

DATE: Oct 7 2022

CONTACT INFORMATION: 831-250-7054

## Response to Letter 201, Deanna Edwards

1. See response to Letter 2c.



## 2.4 Verbal Comments on the Revised Draft EIR

Verbal comments were received regarding the proposed project and on the revised draft EIR at a Special Meeting of the Board on Tuesday, September 6, 2022 at 5:30 P.M. in the Carmel Middle School Gymnasium. The comment period was reopened at 6:30 P.M. The following is a summary of the verbal comments on the RDEIR and responses to those comments.

### Verbal Comment 1, Bell James

The commenter expressed the following environmental concerns:

- People visiting the school park on her street and she would like no parking signs at the intersection where she lives on Morse Drive, closest to the tennis courts;
- There should be consequences if people park in a no parking zone; they should be towed;
- Need a new pedestrian pathway; and
- Would like the proposed lights turned off by 10:00.

### Response to Verbal Comment 1, Bell James

Regarding parking off-site in the neighborhood, the proposed project includes an additional 111 on-campus parking spaces. Additionally, Mitigation Measure 11-4 in Section 11.0, Transportation, require preparation and implementation of a Traffic Management Plan during highly-attended events at the campus.

A new pedestrian pathway is proposed on the existing road from the new tennis court parking lot to the baseball parking lot, and along the new roadway connecting the stadium to the new tennis court parking lot. See Figure 4-6, Post Development Overall Parking Exhibit, of the RDEIR.

Regarding time when the lights will be turned off, see Table 4-3, Proposed Stadium and Pool Facility Lighting Schedule, in the RDEIR, which identifies the range of starting times and the ending time for the lights to be turned off. Additionally, Mitigation Measure 5-2a requires the lights to be turned off by 10 pm for football games, and earlier for other games and practices.

No changes to the RDEIR are required.

### Verbal Comment 2, Meredith Nole

The commenter presented the environmental following:

- The commenter is a lighting consultant and has three suggestions: (1) contact the Illuminating Engineering Society in San Francisco; (2) look at an option to build a truss with steel/iron bars and hang down lights to create an even distribution; and look for more options for lighting the stadium.

## Response to Verbal Comment 2, Meredith Nole

The commenter expressed interest in the school district evaluating alternative lighting options. The proposed lighting is designed for high school sports field games. Building a truss with steel/iron bars at 70 to 80 feet high with hang down lights would result in greater visual impacts due to the size of such a structure, compared with just four 70- to 80-foot-high poles. See also response to Letters 12a and 12b.

## Verbal Comment 3, Fran

The commenter expressed the following environmental concerns:

- Safety and emergency access routes;
- Removal of the tennis courts and energy used for tennis students travel;
- Impacts to scenic highway 1;
- Killing protected trees (page 199);
- Significant and unavoidable light pollution from Point Lobos to Carmel by-the-Sea; expand 3.5-mile radius; lighting impacts will reach Santa Lucia Preserve; why not include Camel-by-the-Sea, Point Lobos, Carmel Valley, Palo Conora, Jacks Peak; and
- Fix the light pollution on the pools now.

## Response to Verbal Comment 3, Fran

Regarding safety and emergency access, see response to Letter 14-2-f.

Regarding energy used for tennis students travel, fewer students would travel off-site for practices with implementation of the project and therefore, this would not increase energy impacts. See Section 4.0, Project Description, pages 4-36 and 4-37 of the RDEIR. Please also see response to Letter 14-4-e.

Regarding visual impacts to State Route 1, see Section 5.0, Aesthetics, of the RDEIR.

Regarding potential tree removal, see Section 7.0, Biological Resources. See also response to Letter 2b, comment 4.

Regarding the significant and unavoidable light pollution, see response to Letter 2b, comment 2 and Response to Letter 14-2-b, comment 1, as well as Section 5.0, Aesthetics, of the RDEIR.

Regarding the pool lights, the proposed project includes retrofitting the existing pool lights to reduce their impact. Please refer to Section 4.0, Project Description, of the RDEIR.

#### **Verbal Comment 4, No Name**

The commenter expressed the following environmental concerns:

- Why did the school district release the 394-unnumbered pages of RDEIR on a Friday before a three-day weekend;
- New construction of buildings and roadways; and
- Destruction of trees and removal of tennis courts.

#### **Response to Verbal Comment 4, No Name**

The RDEIR, which includes 394 pages, includes a detailed table of contents and page numbers. It was release for the required 45-day public comment period. There are no CEQA requirements disallowing release of the RDEIR on a Friday before a three-day weekend.

The impacts of new buildings, roadways, and removal of the tennis courts is addressed in the RDEIR. Potential tree removal is addressed in Section 7.0, Biological Resources. See also response to Letter 2b, comment 4.

#### **Verbal Comment 5, Charles Wally**

The commenter expressed the following environmental concerns:

- Did not agree with the method of light pollution assessment; it is flawed and biased and based upon faulty data; lighting impacts will go beyond the small sphere of influence; should have looked at impacts at residences, not just public roads; and
- School district exemption from zoning rules.

#### **Response to Verbal Comment 5, Charles Wally**

The district, as the lead agency, has discretion to determine the appropriate way to analyze environmental impacts in an EIR, and as discussed in Section 5.0, Aesthetics, of the RDEIR, the district utilized a standard, accepted methodology to assess lighting impacts. Regarding the lighting impact assessment, see response to Letter 114b. Regarding the school district's exemption from zoning rules, see response to Letter 2b, comment 4, and Letter 1b, comment 16.

#### **Verbal Comment 6, Larry Arthur**

The commenter expressed the following environmental concerns:

- Transferring the noise from daytime to nighttime and Carmel is not Visalia;
- Need to include actual measurements and impacts to sensitive receptors;
- Noises include 129 db airhorn blast, foot stopping on aluminum bleachers that sounds like a freight train, public address system blaring, 117 db thunder whistles, and fan cheering; and
- At the last shoe game, this noise was so loud that many cleared out of the stands.

## Response to Verbal Comment 6, Larry Arthur

See response to Letter 58b.

## Verbal Comment 7, Susan

The commenter shared the following environmental concerns:

- Putting in the parking lots will pave paradise;
- The school district lets people park in the neighborhood; and
- The EIR does not provide mitigation for impact to the neighborhood.

## Response to Verbal Comment 7, Susan

Impacts associated with the proposed parking lots, which is a component of the project description, is addressed in the RDEIR. See also response to Verbal Comment 1 above.

## Verbal Comment 8, No Name

The commenter shared the following environmental concerns:

- Investigate several options including putting in a lighted stadium at Carmel Middle School in the valley, and enhancing the daytime program with night games at other schools that have long-time programs.

## Response to Verbal Comment 8, No Name

The RDEIR includes the evaluation of several alternatives in Section 18.0, Alternatives: No Project with Late Start; No Project without Late Start; After Dark Practices and Games at Alternative Locations (Monterey Peninsula College and Pacific Grove High School); Alternative Location (New, Lighted Stadium at Carmel Middle School) for Practices and Games; and a Reduced Project Alternative (No Stadium Lights). No additional alternatives analysis in the RDEIR is necessary.

## Verbal Comment 9 No Name

The commenter expressed his opposition to the proposed project, was impressed with the other commenters, and wants the school board to listen to them, but did not comment on environmental issues or the RDEIR.

## Response to Verbal Comment 9, No Name

The commenter did not comment on environmental issues or the RDEIR and therefore, no response is required. A decision on the project's merits will be made by the Board, who will consider all timely comments.

## Verbal Comment 10, No Name

The commenter shared the following environmental concerns:

- The climate crisis. The world is heating up and California is burning. Concerned with the giant billboards of stadium lights all around football field, 80-foot-tall light poles as wide as shipping containers, and from 50 to 60 K lumens searing through the nighttime skies and sticking taxpayers with the energy bill;
- Light pollution impacts on humans; sleep disorders, depression, and compromised immune systems;
- Negative effects on animals including migratory birds, baby turtles are drawn from the ocean, owls starve, and population of insects decline; and
- Don't need more invasive nighttime lighting; need to protect fragile environment and dark sky; all will be destroyed by the stadium lights and will never return.

## Response to Verbal Comment 10, No Name

Regarding the climate crisis and energy issues, the RDEIR addresses both greenhouse gas emissions (Section 9.0) and energy (Section 10.0). Regarding alleged impacts of light pollution on humans, please refer to response to Letter 5, comment 3. Please also see Section 5.0, Aesthetics, of the RDEIR for an analysis of nighttime lighting environmental impacts. Regarding potential environmental impacts on birds and other species, please refer to Section 7.0, Biological Resources.

## Verbal Comment 11, Jane O'Camp

The commenter expressed the following environmental concerns:

- The project was expanded to include more;
- Concerned with safety, traffic, noise, and light pollution, including increased lighting with parking lots and connecting roads; and
- Concerned the lights will be left on all night long.

## Response to Verbal Comment 11, Jane O'Camp

For information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1. Regarding traffic and traffic safety, see Section 11.0, Transportation and Parking of the RDEIR. Regarding noise, see Section 10.0, of the RDEIR. Regarding light pollution, see Section 5.0, Aesthetics of the RDEIR. As set forth in Mitigation Measure 5-2a, lights will be turned-off by 10 pm. Please see response to Letter 195, comment 15, and response to Verbal Comment 1.

## Verbal Comment 12, Will

The commenter expressed the following environmental concerns:

- The project is expanding;
- Concerned with practice lights every night of the week on scenic Highway 1;
- Not enough parking;
- Traffic and dangerous conditions on Highway 1 at night;
- Parking nightmare for residents;
- With the Sunshine Protection Act, the project will be unnecessary;
- The project will lead to big, multi-level buildings and multi-level parking structures on Highway 1.

## Response to Verbal Comment 12, Will

Regarding the project expansion and insufficient parking, parking lots were added to the proposed project to address the neighbor's concern that there is not enough on-campus parking. For more information regarding the CEQA process and project scope, please see Subsection 1.5 of the RDEIR, and refer to response to Letter 11b, comment 16, and response to Letter 14-1-u, comment 1.

The number of days the lights are anticipated to be on, during each month of the year, is included in Table 4-3, Proposed Stadium and Pool Facility Lighting Schedule. Lighting impacts are addressed in Section 5.0, Aesthetics of the RDEIR. Traffic safety is addressed in Section 11.0, Transportation and Parking. See also response to Letter 14-1-k. Regarding the Sunshine Protection Act, see response to Letter 2b, comment 5. Finally, the project description does not include big multi-level buildings and parking structures on Highway 1 or on the high school campus, and there is no evidence that approval and implementation of the proposed project would result in this type of new construction.

## Verbal Comment 13, Susan Miller

The commenter expressed the following environmental concerns:

- The EIR includes linkage for two entirely separate functions: dark sky lights for the pool and late start;
- The school district could have late start, seven period day, with afternoon practices, and examples have been ignored; and
- Would like pool lights to be replaced now with dark sky lights; EIR implies they will not be changed until everything changes.



## Response to Verbal Comment 13, Susan Miller

This comment does not raise any specific environmental issues and therefore, no response is necessary. However, the school board does have the discretion to approve the entire project, or portions of the project. A decision on the project's merits will be made by the Board, who will consider all timely comments. Please also see response to Letter 97.

## Verbal Comment 14, Alan Miller

The commenter expressed the following environmental concerns:

- Student athletes other than the football players, especially women athletes, would not have a place to practice;
- Where will the tennis players practice;
- If the nights were only used a few Friday nights, significantly fewer people would object to the project; the problem is turning the lights on every night for practice that has generated opposition in the community;
- Need to find a place where all the teams can practice with adequate lighting;
- The high school is not the place for lighting;
- Why not move all student athletes practice at the middle school and provide the lighting there;
- The EIR says that the project at the middle school would generate more environmental impacts than the project. That assessment is not credible. There are far more parcels of land and homes within ¼ mile of the high school than the middle school, even when new housing will be built near the middle school. People living in the homes are the people most affected by the lights. The EIR does not even attempt to assess the number of people who would be affected; and
- The middle school routinely hosts soccer tournaments and dog shows with more participants and spectators than a high school football game. It does so without running out of parking space or disrupting traffic on Carmel Valley Road. It has more than enough space to accommodate night football games and with adequate lighting for other high school teams to practice and compete.

## Response to Verbal Comment 14, Alan Miller

Regarding student athletes, the proposed project would not limit non-football sports, including women's sports, from practicing at the high school, with the exception of boys and girls tennis, who will practice at Carmel Middle School. See Section 4.0, Project Description.

Regarding the lighting issues, lighting impacts are addressed in Section 5.0, Aesthetics of the RDEIR. Regarding finding another place where teams can practice, see Section 18.0, Alternatives of the RDEIR.

Regarding the impacts on parcels of land and homes with ¼ mile of the high school and middle school, see response to Letter 2b, comment 5. Constructing a lighted stadium at Carmel Middle School is addressed in Section 18.0, Alternatives.

Please also see response to Letter 96.

### **Verbal Comment 15, Jonathan Lyons**

The commenter, the Carmel High School principal, discussed his support for the project, but did not comment on environmental issues or on the RDEIR.

### **Response to Verbal Comment 15, Jonathan Lyons**

This commenter did not raise an environmental issue and therefore, no response is necessary.

### **Verbal Comment 16, Noelle Mills**

The commenter expressed the following environmental concerns:

- Existing issues associated with high school students parking on Flanders Drive;
- Pool lights on all night, and additional lights associated with the project;
- The project should be constructed at Carmel Middle School; you would not have to pave anything at the middle school; and
- Concerned that putting in parking lots would pave paradise.

### **Response to Verbal Comment 16, Noelle Mills**

Regarding high school students parking on Flanders Drive, the proposed project includes adding 111 new on-campus parking spaces in two locations: one that would replace the existing tennis courts, and one located east of the swimming pool in a highly-disturbed areas with storage containers and old, unused portable classrooms. Please refer to Section 4.0, Project Description, of the RDEIR. Environmental impacts associated with implementing the project, including the new parking lots, is addressed throughout the RDEIR, including, without limitation, at Section 5.0, Aesthetics, Section 11.0, Transportation and Parking, Section 12.0, Soils, Erosion, and Water Quality, and Section 14.0, Recreation. Pool lights are an existing condition. Please refer to Section 3.0, Environmental Setting, of the RDEIR. Lighting impacts are addressed in Section 5.0, Aesthetics in the RDEIR, and constructing the lighted stadium at the middle school is addressed in Section 18.0, Alternatives in the RDEIR and as discussed, would result in greater impacts than would the lighted stadium at the high school.

### **Verbal Comment 17, No Name**

The commenter expressed the following environmental concerns:

- Noise impacts at night;

- Existing pool lights, and the proposed stadium lights;
- Why doesn't the school have to abide by the same rules as the homeowners; and
- Supports constructing the project at the middle school.

### **Response to Verbal Comment 17, No Name**

Noise impacts are addressed in Section 10.0, Noise of the RDEIR. Existing pool lights are addressed in Section 3.0, Environmental Setting. The proposed project, including pool and stadium light components, are addressed in Section 4.0, Project Description. Environmental impacts associated with pool and stadium lights are addressed in Section 5.0, Aesthetics of the RDEIR; regarding rules, see response to Letter 2b, comment 4 and Letter 11b, comment 16; and construction of a lighted stadium at the middle school is addressed as an alternative in Section 18.0, Alternatives.

### **Verbal Comment 18, No Name**

The commenter expressed the following environmental concerns:

- The existing nighttime photos in the revised draft EIR are a bit misleading;
- Comparing an accurate photo with the simulation of the stadium tower lights, shows a significant increase in brightness, which will occur 147 nights a year;
- With an output of about 5 million lumens, the project will have a significant adverse impact on Carmel views;
- The pool lights will be on for 84 nights a year;
- We don't know much about the long-term health effects of blue lights at this high level of illumination;
- Does the lighting need to be on full brightness at all games and practices providing 50-foot candles of illumination; and
- Other high schools are planning to use 40-foot candles and some lighting authorities say that 30-foot candles remain the standard for high school stadiums.

### **Response to Verbal Comment 18, No Name**

Section 5.0, Aesthetics, of the RDEIR, included visual simulations of the light poles, and lights after dark from nine locations, and concluded that the lighting impact would be significant and unavoidable. Please also see response to Letter 2b, comment 2. Health effects are addressed in response to Letter 5, comment 3. The commenter states that other high schools are planning lights that are lower in height (30-40 feet), but does not provide any evidence. The commenter also states the project will produce an output of 5 million lumens; however, it is not clear what data or information the commenter is referring to when they state the project would result in "5 million lumens." The RDEIR does not state this total nor give any lumen totals for the project. Lumen totals per fixture type are shown in Appendix C (see "Fixture Type Summary" for each of the

Illumination Summaries) of the RDEIR. Past or future projects at other high schools are not included in the project description and are outside the scope of the RDEIR. Additionally, the Illuminating Engineering Society recommends the lighting at 80 feet above the playing surface. There is no differentiation between game and practices. Please see response to Letter 2b, comment 2. Table 4-3 of the RDEIR sets forth the Proposed Stadium and Pool Facility Lighting Schedule.

### **Verbal Comment 19, Marjorie**

The commenter expressed the following environmental concerns:

- Friday night football seems to be the driving force behind the lights; high school football in the U.S., specifically in California, has been declining for at least the last seven years;
- Erecting four towers nearly doubles the height of the average height of buildings in the community, and the associated light pollution, resulting in a negative impact;
- The revised draft EIR Figure 5-2 photo shows the vast area of the community that will be impacted and the impact will go far beyond that; and
- An enhanced sound system.

### **Response to Verbal Comment 19, Marjorie**

The comment about Friday night football does not raise an environmental issue and therefore, no response is necessary. The adverse environmental impacts of the light poles and the lights are addressed in Section 5.0, Aesthetics of the RDEIR. Please also see response to Letter 150. To clarify, no new public address or sound system is proposed as part of the project. Please see Section 4.0, Project Description, and Section 10.0, Noise, of the RDEIR.

### **Verbal Comment 20, Joanne Holbrook**

The commenter expressed the following environmental concerns:

- Change the quality of life a bit for the better for students and parent, but a disaster for Carmel and the Monterey Peninsula because of the lights;
- Middle school was meant to be the high school;
- Dark sky lights would not work when there is moisture in the air; and
- Paradise will be lost for everyone, thousands and thousands of people.

### **Response to Verbal Comment 20, Joanne Holbrook**

Lighting impacts are addressed in Section 5.0, Aesthetics, of the RDEIR. The middle school alternative is addressed in Section 18.0, Alternatives. Lighting with moisture in the air is addressed in Section 5.0, Aesthetics, as is sky glow, and see response to Letter 2b, comment 2.

### **Verbal Comment 21, Tierra Teeves**

The commenter thanked the board for their service and feels for them that people are attacking their character and integrity. She expressed the following environmental concerns:

- As a scientist, she knows the impacts of not getting enough sleep and the lights are needed so that kids can sleep in and still play sports. If the Sunshine Protection Act is passed, then the lights will not have to be on as long;
- False information in her mailbox about renting the stadium to outsiders;
- Wants people to stick to the facts;
- Traffic mitigations are in the EIR; and
- Work for a solution that is best for the kids.

### **Response to Verbal Comment 21, Tierra Teeves**

The commenter expresses her support for the project, but does not raise any environmental issues. Therefore, no response is necessary.

### **Verbal Comment 22, Noelle Ballerini**

The commenter expressed the following environmental concerns:

- Nature would be irreversibly damaged;
- Existing noisy games happened during the day and so glad when they are over; and
- Happening at night would be inconsiderate and ruin the peace in our home.

### **Response to Verbal Comment 22, Noelle Ballerini**

Various components of nature are addressed throughout the RDEIR. Specifically, Section 7.0, Biological Resources, addresses impacts to vegetation and wildlife. Noise is addressed in Section 10.0, Noise.

### **Verbal Comment 23, No Name**

The commenter expressed the following environmental concerns:

- Wants to see story poles, used in construction all the time;
- Demolition of tennis courts; and
- Noise during games.

### **Response to Verbal Comment 23, No Name**

Regarding story poles, see response to Letter 2c, comment 1. The environmental impacts associated with demolition of the tennis courts and construction of a parking lot is addressed throughout the RDEIR. Noise is addressed in Section 10.0, Noise.

### **Verbal Comment 24, Brandon Cook**

The commenter expressed his support of the project as lighting benefits all sports including girls field hockey, not just football.

### **Response to Verbal Comment 24, No Name**

No environmental issues were identified and therefore, no response is necessary.

### **Verbal Comment 25, Maria**

The commenter expressed the following environmental concerns:

- Lighting up the dark sky.

### **Response to Verbal Comment 25, Maria**

Lighting impacts are addressed in Section 5.0, Aesthetics of the RDEIR.

### **Verbal Comment 26, No Name**

The commenter expressed the following environmental concerns:

- Visual impact of the light poles;
- No energy analysis was done because energy comes from energy coop using renewable energy. What is their solvency?; and
- No amount of new metric tons of carbon is acceptable.

### **Response to Verbal Comment 26, No Name**

The visual impacts of the proposed light poles are addressed in Section 5.0, Aesthetics of the RDEIR. Regarding energy analysis and metric tons of carbon, see Section 8.0, Energy of the RDEIR, as well as response to Letter 182a.

### **Verbal Comment 27, Nina**

The commenter expressed the following environmental concerns:

- Light pollution is very bad for human health and reproductive nature of various animals, in particular the endangered red-legged frog in the Carmel River and pond at Palo Corona Park;
- Protect the preserves all around us;
- Protect the character of Carmel who don't have mailbox that protects the beauty of the surrounding area;
- Limitations and timing of use of lighted stadium;
- The lights will be on 24 hours for massive costs; and
- Alternative at the middle school is not viable due to the impact on the Carmel River and preserves intended to maintain a healthy ecosystem.



## Response to Verbal Comment 27, Nina

Regarding light pollution and its impact on human health, see response to Letter 5, comment 3. Regarding light pollution and its impact on animals, see Section 7.0, Biological Resources in the RDEIR. See also response to Letter 195, comments 10 and 23. Habitat for the endangered California red-legged frog is not located in the vicinity of the project site (see page 7-18); however, habitat for the frog is located in the immediate vicinity of Carmel Middle School, an alternative location to the proposed project (see page 18-25 and 26). Regarding limitations and timing of use of lighted stadium, see Table 4-3, Proposed Stadium and Pool Facility Lighting Schedule, as well as Mitigation Measure 5-2a and 5-2b.

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# 3.0 Changes to the Revised Draft EIR

## 3.1 CEQA Requirements

CEQA Guidelines section 15132 requires that a final EIR contain either the draft EIR or a revision of the draft EIR. This final EIR incorporates the revised draft EIR (RDEIR) by reference and includes the revisions to the RDEIR, as presented on the following pages.

This section contains text from the RDEIR with changes indicated. Additions to the text are shown with underlined text (underline) and deletions are shown with strikethrough text (strikethrough). Explanatory notes in italic text (italic) precede each revision.

The information contained within this chapter clarifies and expands on information in the RDEIR and does not constitute “significant new information” requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

## 3.2 Changes to the Summary

Table 2-1, Summary of Significant Impacts and Mitigation Measures, is included in its entirety here, with changes.

### Starting with Page 2-7

(See next page 3-2)

## 3.3 Changes to Section 4.0, Project Description

*The following objective has been modified to add the applicable Education Code section number.*

### Page 4-1

- 2) Provide athletic facilities that facilitate implementation of the State’s “late start law” (Education Code, Section 46148) without disruption to the District’s existing educational and athletic programs;

**Table 2-1 Summary of Significant Impacts and Mitigation Measures**

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
<b>Aesthetics</b>			
<p><b>Impact 5-2.</b> 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</p>	<p>Significant</p>	<p><b>Mitigation Measure 5-2a.</b> 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:</p> <p>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 (<u>game is defined as both Junior Varsity and Varsity level competitions that occur on the same day</u>):</p> <ul style="list-style-type: none"> <li>▪ Football. Six games;</li> <li>▪ Girls field hockey. Ten games;</li> <li>▪ Boys and girls soccer. Twelve games for each team; <u>and</u></li> <li>▪ Boys and girls lacrosse. Twelve games for each team.; <del>and</del></li> <li>▪ <del>Boys and girls track and field. Four meets (combined).</del></li> </ul> <p>This would total <del>forty four</del> <u>sixty-four</u> games <del>and/or meets</del> combined between football, soccer, field hockey, and lacrosse, <del>and track and field</del>. 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.</p> <p>Practices. All field sports practices shall end by 8:00 p.m. with lights turned off by 8:30 p.m. <u>The school district shall also implement a practice lighting reduction measure, which will consist of dimming the stadium lights immediately after active field practice ends. This function shall be pre-programmed into the stadium lighting package by the school district at the beginning of each sports season for each sports team.</u></p> <p><u>Lighted practices will not be held on Saturdays and Sundays.</u></p> <p><b>Mitigation Measure 5-2b.</b> 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. <u>"Non-School Related Groups" is defined as follows: Any group or entity other than Carmel Unified School District, its schools, and programs.</u></p>	<p>Significant and Unavoidable</p>

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<p><b>Mitigation Measure 5-2c.</b> 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.</p> <p><b>Mitigation Measure 5-2d.</b> 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.</p> <p><b>Mitigation Measure 5-2e.</b> The Carmel Unified School District shall prepare and implement a <u>landscape plan that will assist in softening the visual impacts of the project from State Route 1 to the extent feasible. The landscape plan will also include vegetation south and east of the stadium. The plan shall include, but not be limited to the following:</u></p> <ul style="list-style-type: none"> <li>a. <u>Landscape screening and restoration shall consist of locally native plant and tree species consistent with surrounding native vegetation;</u></li> <li>b. <u>Trees and/or shrubs shall be included in the following areas to the extent feasible:</u> <ul style="list-style-type: none"> <li>i. <u>Along the State Route 1 high school frontage in the vicinity of the stadium and new parking area;</u></li> <li>ii. <u>South of the stadium and within and/or adjacent to the new parking area replacing the tennis courts;</u></li> <li>iii. <u>East of the campus, including east of the new parking area near the pool, and east of the stadium; and</u></li> <li>iv. <u>Trees planted east of the stadium shall be located at least 25 feet from the existing drainage in that area (see Figure 7-1 Habitat Map in the RDEIR).</u></li> </ul> </li> </ul>	
<b>Biological Resources</b>			
<b>Impact 7-2.</b> Potential Effect on Special-Status Species (Hoary Bat)	Significant	<b>Mitigation Measure 7-2.</b> 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	Less than Significant

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<p>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.</p> <p>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.</p> <p>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:</p> <ol style="list-style-type: none"> <li>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.</li> <li>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</li> </ol>	



Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<p>during dark hours, which increases their chance of finding new roosts with a minimum of potential predation.</p> <p>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.</p> <p>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.</p>	
<p><b>Impact 7-3. Potential Effect on Special-Status Species (Nesting Raptors and Migratory Birds)</b></p>	<p>Significant</p>	<p><b>Mitigation Measure 7-3.</b> 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.</p> <p>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.</p> <p>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</p>	<p>Less than Significant</p>

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<p>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.</p> <p>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.</p>	
<b>Impact 7-6.</b> Potential Tree Removal	Significant	<b>Mitigation Measure 7-6.</b> 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.	Less than Significant
<b>Tribal and Cultural Resources</b>			
<b>Impact 13-1.</b> A Potential Adverse Substantial Adverse Change in the Significance of a Historical Resource Pursuant or a Unique Archaeological Resource	Significant	<b>Mitigation Measure 13-1.</b> 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.	Less than Significant
<b>Impact 13-2.</b> Potential to Disturb Native American Human Remains, Including Those Interred Outside of Dedicated Cemeteries	Significant	<b>Mitigation Measure 13-2.</b> Due to the possibility that human remains may be discovered during construction activities; the following language shall be included in all project construction documents: <p>"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.</p> <p>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.</p>	Less than Significant

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		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."	
<b>Noise</b>			
<b>Impact 10-3.</b> Construction Activities Could Cause a Substantial Temporary Noise Increase	Significant	<b>Mitigation Measure 10-3.</b> 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.	Less than Significant
<b>Transportation</b>			
<b>Impact 11-3.</b> Construction Traffic Could Result in Safety Impacts When School is in Session	Significant	<b>Mitigation Measure 11-3.</b> 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.	Less than Significant
<b>Impact 11-4.</b> An Increase in Event Attendance Could Result in Inadequate Parking During Limited Nighttime Events with Potential Emergency Access Issues	Significant	<b>Mitigation Measure 11-4.</b> 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	Less than Significant

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<p>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;</p> <p>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;</p> <p>c. <del>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, p</del> 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;</p> <p>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.</p>	

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<p>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.</p> <p>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.</p> <p>g. <u>The district shall evaluate the Traffic Management Plan on an annual basis at the conclusion of football season if requested and provided with a concern regarding the plan's adequacy. This would include a review of, but not be limited to, parking issues that might occur in the neighborhoods west of State Route 1 if such concern is raised, and would likewise include, to the extent feasible, revisions to the Traffic Management Plan if deemed necessary by the district to address concerns raised.</u></p>	

SOURCE: EMC Planning Group 2022

*The following text has been revised to clarify who would be allowed to park in the new parking lot east of the pool facility.*

## **Page 4-6**

An additional 35 standard parking spaces are proposed east of the existing pool facility where storage buildings and containers currently sit along the campus ring road. The two storage buildings and two storage containers will be removed and replaced by an area sufficient to accommodate the 35 parking spaces which will be re-paved and striped. These 35 parking spaces are intended ~~to accommodate students~~ for staff and as overflow for visitors for events such as Padre Parents meetings during the school day and then are to be used by staff and participants during sporting events. Spectators will not park in this area during any sporting events. This additional parking area will be accessed via Ocean Avenue and the campus ring road. Removal and demolition activities will include the initial removal of all freight storage containers in the vicinity of the proposed east parking lot area and the demolition and remove from the property two, 960-square foot (each), single story, wood foundation, modular classroom buildings. An additional 1,000 square foot, single story wood frame storage building will be demolished and removed from the property. Minimal grading will be required to accommodate the expanded paved parking area. No additional lighting is required for this new parking area. Plans include tree box filters (best management practice for stormwater treatment), a 24-inch-high retaining curb, reconstruction of the existing fence, and addition of a gate).

*The figure on the following page, [Figure 4-2d, Illumination Summary – Edge of Campus \(Foot-Candles\)](#), has been added to show the foot-candle illumination at the edge of campus.*

## **Page 4-11, [Figure 4-2c, Foot-Candle Measurement Summary – Track](#)**

*The following text has been revised to indicate that track and field would not occur after dark and therefore, no lighting would be necessary for this sport.*

## **Page 4-22**

The proposed project is intended to expand the timing and use of the existing stadium facilities for several sports teams including the following: football (boys), soccer (boys and girls), lacrosse (boys and girls), ~~track and field (boys and girls)~~, and field hockey (girls).

*The figure on page 3-13, [Figure 4-10, Tennis Court Parking Lot – Conceptual Design](#), has been added to show the red curbed areas where emergency access vehicles will have access during emergency events.*

## **Page 4-29, [Figure 4-10, Tennis Court Parking Lot – Conceptual Design](#)**





SCALE IN FEET 1 : 200



Note: All numbered measurements shown on this figure represent horizontal footcandle measurements.

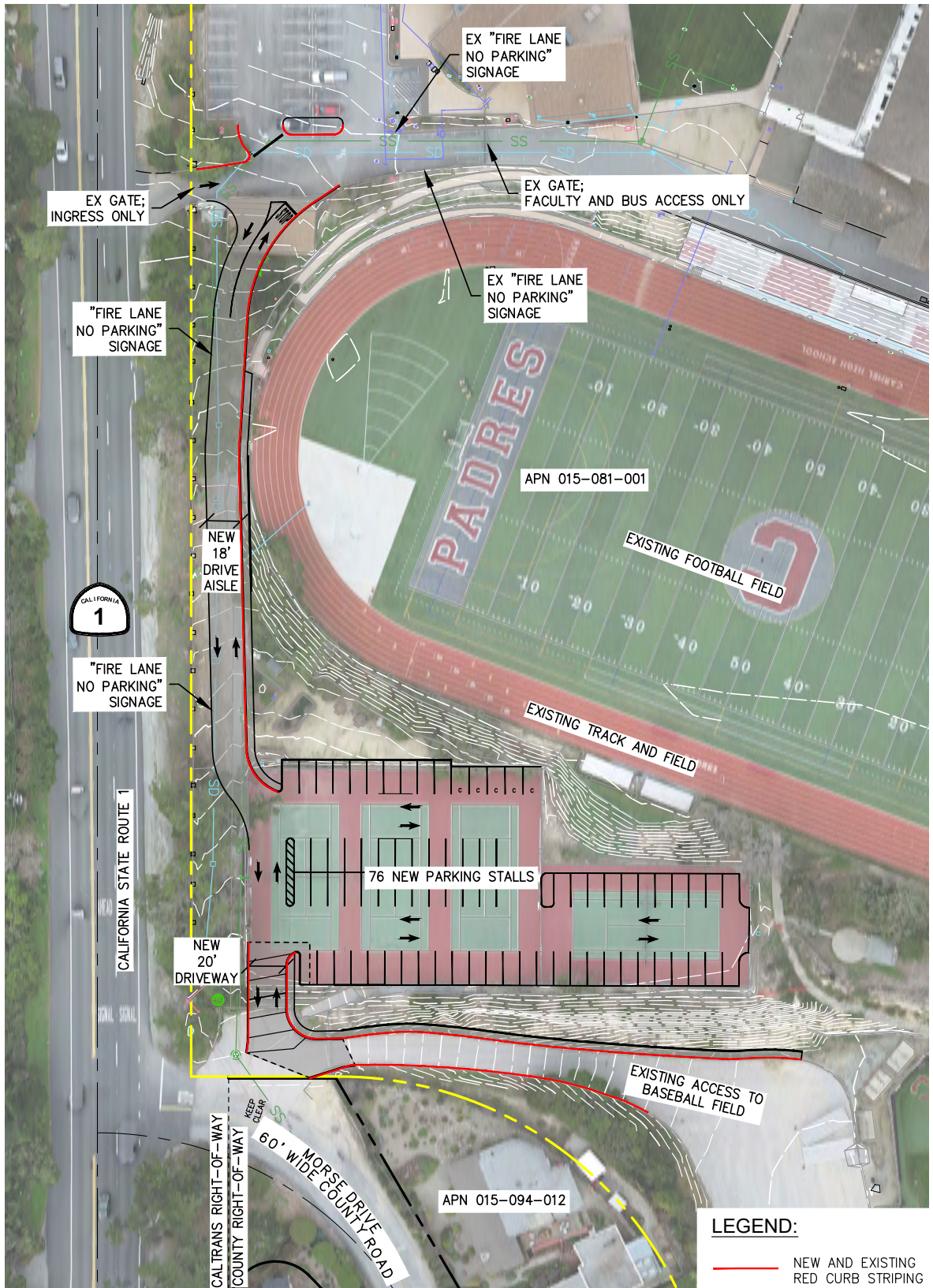
Source: Musco Lighting 2021

## Figure 4-2d Foot-candle Illumination Summary - Edge of Campus

Carmel High School Stadium Improvements Revised Draft EIR

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Source: Whitson Engineers 2022

Figure 4-10

# Tennis Court Parking Lot - Conceptual Design

Carmel High School Stadium Improvements  
Revised Draft EIR



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The following table text has been revised in Table 4-2 to remove the word “evening” as not all practices and games would occur in the evening (i.e., after 6 P.M.)

Page 4-31

**Table 4-1 Proposed Schedule of Stadium Uses (After Installation of Field Lights)**

Sports Team	Days of the Week	Timing		Number of Participants (Student-Athletes, Coaches, and Staff)	Estimated Number of Evening Practices per Week <sup>1</sup> /Home Games per Year (Range)
		Start	End		
<b>Fall Sports (August to November)</b>					
<i>Girls Field Hockey (Varsity)</i>					
Practices	Monday-Friday	4:00 P.M. or 5:45 P.M.	6:00 P.M. or 7:45 P.M.	25	4-5 per week/ 50-60 per year
Games	Monday-Friday	3:30 P.M.	4:45 P.M.	50 (both teams)	7-10 per year
<i>Girls Field Hockey (Junior Varsity)</i>					
Practices	Monday-Friday	4:00 P.M. or 5:45 P.M.	6:00 P.M. or 7:45 P.M.	25	4-5 per week/ 50-60 per year
Games	Monday-Friday	4:45 P.M.	6:15 P.M.	25-50	7-10 per year
<i>Football (Varsity)</i>					
Practices	Monday-Friday	4:00 P.M. or 5:45 P.M.	6:00 P.M. or 7:45 P.M.	50-60	4-5 per week/ 50-60 per year
Games	Friday	7:30 P.M.	10:00 P.M.	100-150	4-6 per year
<i>Football (Junior Varsity)</i>					
Practices	Monday-Friday	4:00 P.M. or 5:45 P.M.	6:00 P.M. or 7:45 P.M.	40-50	4-5 per week/ 50-60 per year
Games	Friday	5:00 P.M.	7:30 P.M.	100-150	4-6 per year
<b>Winter Sports (November to February)</b>					
<i>Girls Soccer (Varsity)</i>					
Practices	Monday-Friday	4:00 P.M. or 5:30 P.M.	5:45 P.M. or 7:15 P.M.	25	4-5 per week 50-60 per year
Games	Monday-Friday	5:45 P.M.	7:15 P.M.	50-60 (both teams)	7-12 per year

Sports Team	Days of the Week	Timing		Number of Participants (Student-Athletes, Coaches, and Staff)	Estimated Number of Evening Practices per Week <sup>1</sup> /Home Games per Year (Range)
		Start	End		
<i>Girls Soccer (Junior Varsity)</i>					
Practices	Monday-Friday	4:00 P.M. or 5:30P.M.	5:45 P.M. or 7:15 P.M.	25	4-5 per week 50-60 per year
Games	Monday-Friday	4:00 P.M.	5:45 P.M.	50 (both teams)	7-12 per year
<i>Boys Soccer (Varsity)</i>					
Practices	Monday-Friday	4:00 P.M. or 5:30 P.M.	5:45 P.M. or 7:15 P.M.	25	4-5 per week/ 50-60 per year
Games	Monday-Friday	5:45 P.M.	7:15 P.M.	50 (both teams)	7-12 per year
<i>Boys Soccer (Junior Varsity)</i>					
Practices	Monday-Friday	4:00 P.M. or 5:30 P.M.	5:45 P.M. or 7:15 P.M.	25	4-5 per week/ 50-60 per year
Games	Monday-Friday	4:00 P.M.	5:45 P.M.	50 (both teams)	7-12 per year
<b>Spring Sports (February to May)</b>					
<i>Girls Lacrosse (Varsity)</i>					
Practices	Monday-Friday	4:00 P.M. or 5:45 P.M.	6:00 P.M. or 7:45 P.M.	25	4-5 per week/ 50-60 per year
Games	Monday-Friday	3:30 P.M.	5:00 P.M.	50 (both teams)	7-12 per year
<i>Girls Lacrosse (Junior Varsity)</i>					
Practices	Monday-Friday	4:00 P.M. or 5:45 P.M.	6:00 P.M. or 7:45 P.M.	25	4-5 per week/ 50-60 per year
Games	Monday-Friday	5:00 P.M.	6:30 P.M.	50 (both teams)	7-12 per year
<i>Boys Lacrosse (Varsity)</i>					
Practices	Monday-Friday	4:00 P.M. or 5:45 P.M.	6:00 P.M. or 7:45 P.M.	25	4-5 per week/ 50-60 per year
Games	Monday-Friday	4:00 P.M.	6:00 P.M.	50 (both teams)	7-12 per year



Sports Team	Days of the Week	Timing		Number of Participants (Student-Athletes, Coaches, and Staff)	Estimated Number of Evening Practices per Week <sup>1</sup> /Home Games per Year (Range)
		Start	End		
<i>Boys Lacrosse (Junior Varsity)</i>					
Practices	Monday - Friday	4:00 P.M. or 5:45 P.M.	6:00 P.M. or 7:45 P.M.	25	4-5 per week/ 50-60 per year
Games	Monday-Friday	6:00 P.M.	8:00 P.M.	50 (both teams)	7-12 per year
<i>Boys &amp; Girls Track &amp; Field (Varsity and Junior Varsity)</i>					
Practices	Monday-Friday	4:00 P.M.	5:30 P.M.	100	4-5 per week/ 50-60 per year
Meets	Thursday	3:30 P.M.	7:30 P.M.	200 (both teams)	2-4 per year
<b>Total of Evening Games per Year (Range)</b>					<del>Evening Practices per Year: 350-400/ Evening Games/Meets per Year: 74-124</del>

SOURCE: CUSD 2022

NOTE: 1. Field sports practices are generally a combined practice with varsity and junior varsity teams.

## Page 4-35

*An additional footnote (#3) has been added to Table 4-4 below to clarify the anticipated attendance increase for other Carmel High School sporting events other than football and soccer (boys and girls) games.*

**Table 4-2 Anticipated Increase in Spectator Attendance**

Sporting Event	Average Annual Number of Events	Average Spectator Attendance Increase per Event	Total Additional Spectator per Sport Per Year
Football Games (Regular)	4	300	1,200
Football Games (Homecoming/Rivalry)	2	500	1,000
Soccer (Boys and Girls)	20	100	2,000
<b>Total</b>			<b>4,200</b>

SOURCE: CUSD

NOTES:

1. Varsity and junior varsity included

2. Soccer junior varsity currently plays matches at Carmel Middle School. With the proposed project, they will play at Carmel High School. Therefore, while those attending the matches at Carmel High School are new spectators at Carmel High School, they do not represent new trips generated by the project.

3. Attendance is not anticipated to increase for any other sporting events.

## 3.4 Changes to Section 5.0, Aesthetics

*The following text has been revised to correct the designation of the project site in the Greater Monterey Peninsula Area Plan.*

### Page 5-3

There are no designated scenic vistas within the project vicinity; however, the Greater Monterey Peninsula Area Plan designates this area as a highly sensitive visual area. ~~Areas designated as highly sensitive are defined as possessing those scenic resources that are most unique and have regional or countywide significance.~~ Areas identified as "sensitive" possess scenic resources which have local or community significance (Monterey County 2010).

### Page 5-20

These hillsides are also designated as "sensitive" or "highly sensitive" according to the "Scenic Highway Corridors & Visual Sensitivity - Greater Monterey Peninsula Map" (Monterey County 2010b).

*The following text has been revised to make corrections in Mitigation Measure 5-2a to indicate that track and field would not occur after dark and therefore, no lighting would be necessary for this sport, and to correct a math error in the total number of games to be playing using the lights. In addition, a recommendation from a lighting study submitted as a comment on the RDEIR has been added to the mitigation measure to reduce stadium lighting at the end of all practices.*

### Page 5-63 and 5-64

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 (game is defined as both Junior Varsity and Varsity level competitions that occur on the same day):

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

This would total ~~forty-four~~ sixty-four games ~~and/or meets~~ combined between football, soccer, field hockey, and 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. The school district shall also implement a practice lighting reduction measure, which will consist of dimming the stadium lights immediately after active field practice ends. This function shall be pre-programmed into the stadium lighting package by the school district at the beginning of each sports season for each sports team.

Lighted practices will not be held on Saturdays and Sundays.

*The following text has been revised to clarify Mitigation Measure 5-2b regarding the terminology “non-school related groups.”*

#### Page 5-64

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. “Non-School Related Groups” is defined as follows: Any group or entity other than Carmel Unified School District, its schools, and programs.

*The following mitigation measure is added to assist with softening the visual impacts from the proposed project; however, the visual impacts would still be significant and unavoidable.*

#### Page 5-64

5-2e. The Carmel Unified School District shall prepare and implement a landscape plan that will assist in softening the visual impacts of the project from State Route 1 to the extent feasible. The landscape plan will also include vegetation south and east of the stadium. The plan shall include, but not be limited to the following:

- a. Landscape screening and restoration shall consist of locally native plant and tree species consistent with surrounding native vegetation;
- b. Trees and/or shrubs shall be included in the following areas to the extent feasible:
  - i. Along the State Route 1 high school frontage in the vicinity of the stadium and new parking area;

- ii. South of the stadium and within and/or adjacent to the new parking area replacing the tennis courts;
- iii. East of the campus, including east of the new parking area near the pool, and east of the stadium; and
- iv. Trees planted east of the stadium shall be located at least 25 feet from the existing drainage in that area (see Figure 7-1 Habitat Map in the RDEIR).

## 3.5 Changes to Section 6.0, Air Quality

*The following text has been changed to correct the amount of renewable energy utilized by the school district.*

### Starting on Page 6-18

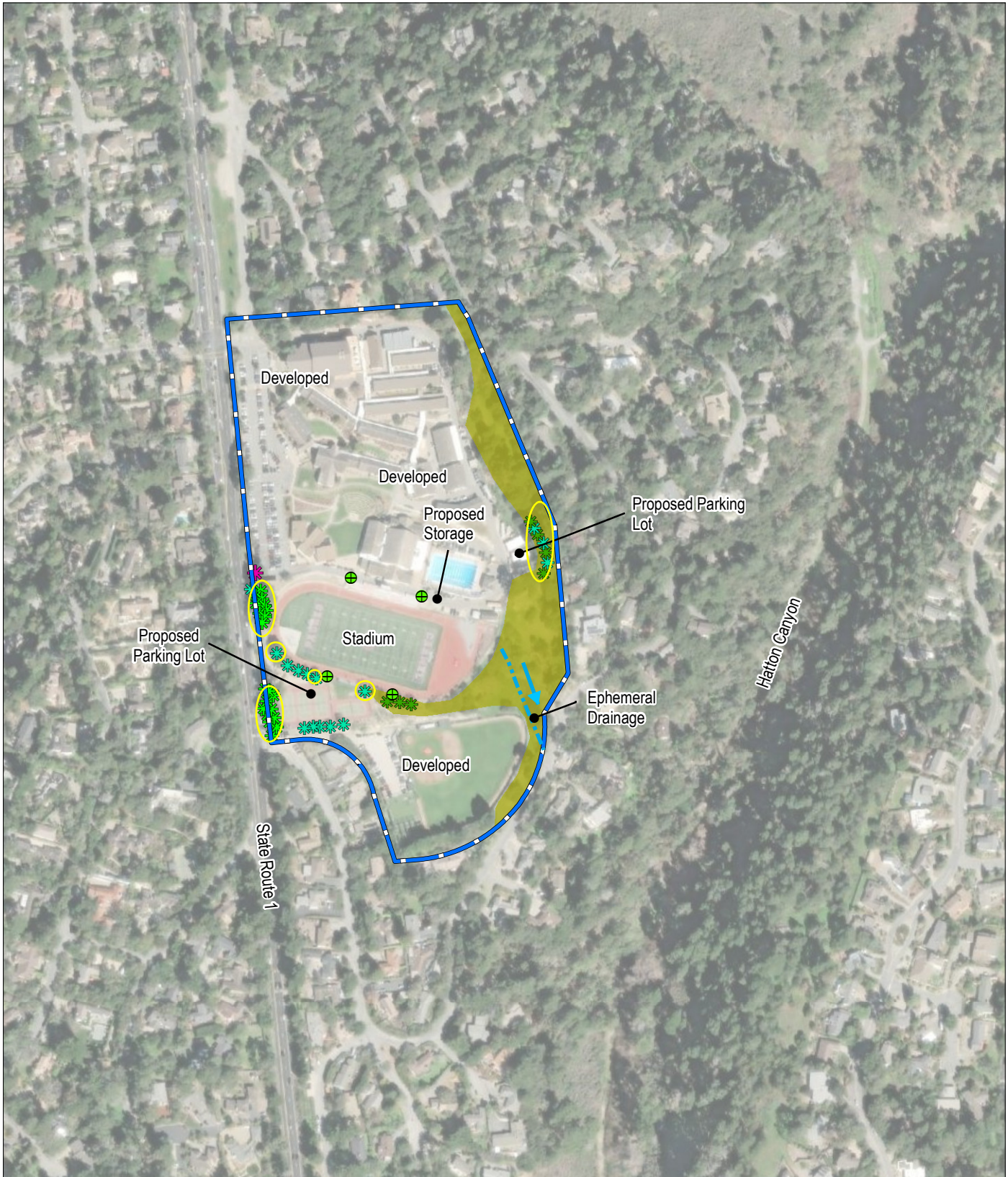
Operation of the proposed project would result in new criteria air pollutant emissions from energy demand and mobile sources due to increased attendance. Electricity is provided to the campus by Central Coast Community Energy ~~from 100 percent renewable sources~~ (Dan Paul, e-mail message to consultant, July 6, 2021). Central Coast Community Energy currently sources approximately 30 percent of its energy from renewable sources. Central Coast Community Energy is a Community Choice Energy agency established by local communities to source clean and renewable electricity for Monterey, San Benito and Santa Cruz counties and parts of San Luis Obispo and Santa Barbara counties while retaining the local utility provider's traditional role delivering power and maintaining electric infrastructure. Central Coast Community Energy procures renewable energy contracts from a variety of sources (refer to Section 8, Energy). As such, operational criteria emissions that would otherwise be generated as a result of project electricity use would be negligible.

## 3.6 Changes to Section 7.0, Biological Resources

*To further highlight the location of the trees with the potential to be impacted by the proposed project, a revision has been made to page 7-3, Figure 7-1, Habitat Map.*

### Page 7-3, Figure 7-1, Habitat Map





Source: ESRI 2022, Monterey County GIS 2019



- School Campus Boundary
- Mixed Oak Woodland
- Potentially Impacted Trees
- Coast Live Oak
- Cedar
- Proposed Light Pole
- Monterey Cypress
- Monterey Pine

Figure 7-1

# Habitat Map



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*The following text of Mitigation Measure 7-3 has been modified to include California Department of Fish and Wildlife recommended text.*

### Starting on Page 7-27

- 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, a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors ~~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.

### 3.7 Changes to Section 8.0, Energy

*The following text has been changed to correct the amount of renewable energy utilized by the school district.*

#### Page 8-1

Electricity is supplied to the campus by Central Coast Community Energy ~~from 100 percent renewable sources~~ (Dan Paul, e-mail message to consultant, July 6, 2021). Central Coast Community Energy is a Community Choice Energy agency established by local communities to source clean and renewable electricity for Monterey, San Benito and Santa Cruz counties and parts of San Luis Obispo and Santa Barbara counties while retaining the local utility provider's traditional role delivering power and maintaining electric infrastructure. Central Coast Community Energy procures renewable energy contracts from a variety of solar, wind, and geothermal projects. Central Coast Community Energy currently sources approximately 30 percent of its energy from renewable sources.

### 3.8 Changes to Section 9.0, Greenhouse Gas Emissions

*The following text has been changed to correct the amount of renewable energy utilized by the school district.*

#### Page 9-19

##### *Operational GHG Emissions*

The proposed project would result in increased electricity consumption from the new stadium lighting, parking lot lighting, and ancillary lighting and interior power use associated with the new storage building. A minor reduction in existing electricity demand would occur from replacing existing pool lighting and existing pathway lights to the new south parking lot with more energy efficient LED lighting. The E-electricity currently is supplied to the campus by Central Coast Community Energy is from approximately 30 100-percent renewable sources. Therefore, t-The minor increase in electricity demand would not generate only a nominal increase in new GHG emissions. For example, GHG emissions from the stadium lights, the main source of electricity demand associated with the proposed project, have been calculated at 0.021 MT CO<sub>2</sub> per year, where approximately 30 percent of the electricity supplied is from renewable sources.

### 3.9 Changes to Section 10.0, Noise

#### Page 10-3

*The following text on page 10-3 was incorrect and has been deleted from the RDEIR. It does not affect the analysis or the conclusions.*

~~As demonstrated by these noise measurements, existing traffic noise levels already exceed the County's noise exposure standards for single family residential (70 L<sub>dn</sub> or dB) at these monitoring sites. See Table 10-3, for additional County noise standards.~~

## Page 10-10

*The following text on page 10-10 (the first sentence under Impact 10-1) has been revised to clarify the expected increase in attendance in football and soccer games, only.*

The proposed stadium lighting project is expected to result in an occasional increase in attendance for the football games and soccer matches, only. ~~and other sporting events.~~

## 3.10 Changes to Section 11.0, Transportation

*The following text has of Mitigation Measure 11-4 has been revised to eliminate the requirement of the school district to encourage walking and biking to events in the dark and to add a measure to evaluate the Traffic Management Plan on an annual basis if requested and provided with a concern.*

### Pages 11-16 through 11-18

#### ***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, p~~ 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.
- g. The district shall evaluate the Traffic Management Plan on an annual basis at the conclusion of football season if requested and provided with a concern regarding the plan's adequacy. This would include a review of, but not be limited to, parking issues that might occur in the neighborhoods west of State Route 1 if such concern is raised, and would likewise include, to the extent feasible, revisions to the Traffic Management Plan if deemed necessary by the district to address concerns raised.

This Transportation Demand Management Plan will be implemented by high school administration. An annual evaluation will be conducted to assess the TMP's success in achieving its goals. The monitoring will identify deficiencies in the operations and planning and recommend measures that can be quickly implemented to resolve the issues. Each year a report will be prepared and submitted by the high school to Monterey County. The effort will consist of collecting observational data to assess which elements of the TMP need to be immediately modified in advance of subsequent events. The following plan elements will be reviewed:

1. Pre and Post Game Day Traffic Management;
2. Number of Football games and special events;
3. Current Parking Requirements;
4. Middle School Parking Demand;
5. Hours of Shuttle;
6. Traffic Congestion and Queuing;

7. Vehicular Pick-ups and Drop-offs;
8. Wayfinding and Signage;
9. Staffing;
10. General Safety and Security; and
11. TMP measures deployed the prior year.

Prior to the first scheduled monitoring football game, a meeting will be held with Monterey County and high school TMP coordinator to identify the specific monitoring locations, durations, and staffing responsibilities. Regular meetings involving Monterey County and the high school TMP coordinator. The suggested schedule is the beginning of the school year, mid-November and the end of the school year. Discussion points would include the monitoring observations and a determination of what modifications to the TMP should be implemented for subsequent events.

A written record of observations, and suggested improvements after each monitoring event will be prepared, and be available for public review at Monterey County offices. The purpose of the TMP is to reduce vehicle trips, and traffic congestion, during night football games and special events.

### 3.11 Changes to Section 18.0, Alternatives

*The following text has been revised to correct the designation of the Carmel Middle School in the Greater Monterey Peninsula Area Plan.*

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Such visual impacts would necessitate the identification and implementation of mitigation measures to reduce those impacts to the extent feasible given the ~~highly~~ visually sensitive area the middle school is located in.

### 3.12 Changes to Section 20.0, Sources

*The following source date has been removed from sources listed for “Section 18.0, Alternatives,” on page 20-13, due to a typographical error.*

Paul, Dan, Director of Facilities & Transportation, Carmel Unified School District. E-mail messages to consultant, 9 June 2021; ~~17 August 2022~~; 22 August 2022.



WJV Acoustics Supplemental Noise Analysis  
(Game Day Noise Levels), dated October 5, 2022







October 5, 2022

Ms. Teri Wissler Adam  
Senior Principal  
EMC PLANNING GROUP INC.  
301 Lighthouse Avenue, Suite C  
Monterey, California 93940

**RE: CARMEL HIGH SCHOOL FOOTBALL GAME DAY NOISE LEVELS**

Dear Ms. Wissler Adam:

As requested, WJV Acoustics, Inc. (WJVA) has conducted noise level measurements in the general vicinity of Carmel High School (CHS), during a scheduled football game at the stadium, held on Saturday October 1, 2022. The varsity football started at 2:00 p.m. and concluded just prior to 4:30 p.m.

Noise levels were measured continuously during the football game at four (4) locations (G-1 through G-4), using automated sound level meters. Additionally, WJVA staff conducted short-term spot measurements at six (6) locations (S-1 through S-6) in the vicinity of the stadium and nearby residential areas, throughout the course of the football game. The locations of the ten sampled sites are provided at the end of this letter, as Figure 1.

Noise monitoring equipment utilized for the measurements consisted of Larson-Davis Laboratories Model LDL-820 sound level analyzers equipped with B&K Type 4176 1/2" microphones. The equipment complies with the specifications of the American National Standards Institute (ANSI) for Type I (Precision) sound level meters. The meters were calibrated in the field prior to use with a B&K Type 4230 acoustic calibrator to ensure the accuracy of the measurements. The microphones were located on a tripod at 5 feet above the ground.

**CONTINUOUS GAME DAY NOISE LEVEL MEASUREMENTS-**

Hourly noise levels measured during the football game (2:00 p.m. to 5:00 p.m.) at the four measurement sites are summarized below in Table I. Noise levels are provided in terms of the hourly

energy average ( $L_{eq}$ ) and hourly maximum ( $L_{max}$ ). Noise levels measured at all four sites take into account all noise sources in the project vicinity (including football game activities), and should therefore be considered a worst-case assessment of noise levels associated with football game activities occurring the CHS stadium.

TABLE I MEASURED NOISE LEVELS DURING FOOTBALL GAME CARMEL HIGH SCHOOL STADIUM OCTOBER 1, 2022		
Site	$L_{eq}$ , dBA Average (Range)	$L_{max}$ , dBA Average (Range)
G-1	49.1 (47.0-51.0)	61.0 (59.1-62.7)
G-2	46.7 (44.9-48.5)	59.3 (57.6-61.0)
G-3	50.8 (49.3-53.2)	72.2 (69.2-77.8)
G-4	47.5 (44.6-49.8)	65.6 (64.8-66.2)

Source: WJV Acoustics, Inc.

Three of the four measurement site locations (G-1, G-3 and G-4) utilized during the football game event were also previously used during the existing ambient noise survey previously conducted during the preparation of the project Environmental Noise Assessment (ENA), previously prepared by WJVA. Ambient noise levels were previously measured at site G-1 on March 22, 2022 and at sites G-3 and G-4 on April 20, 2021. Table II summarizes the measured noise levels at these three sites, previously measured during these same hours (2:00 p.m. to 5:00 p.m.), when no activities were occurring at the stadium facility.

TABLE II MEASURED AMBIENT NOISE LEVELS (WITHOUT STADIUM ACTIVITIES) APRIL 2021 & MARCH 2022		
Site	$L_{eq}$ , dBA Average (Range)	$L_{max}$ , dBA Average (Range)
G-1	43.1 (40.8-45.5)	59.8 (54.1-68.4)
G-3	53.1 (52.3-53.8)	73.6 (72.9-74.4)
G-4	49.7 (47.7-50.8)	68.5 (61.8-74.0)

Source: WJV Acoustics, Inc.

Reference to both Table I and Table II indicate that noise levels measured at site G-1 were slightly higher during the game day measurements than during the ambient noise survey measurements (without any activities occurring at the stadium). However, noise levels measured at both sites G-3 and G-4 during the football game were not higher than those previously measured during the ambient noise survey.

#### **SHORT-TERM NOISE LEVEL MEASUREMENTS-**

In addition to the above-described continuous noise level measurements conducted at the four noise measurements sites, WJVA staff also conducted numerous “spot-checks” of noise levels throughout the residential areas surrounding the stadium, during the football game period (2:00 p.m. to 5:00 p.m.) on October 1, 2022. During these short-term measurements, WJVA staff observed the noise meters during specific noise-producing activities and actions associated with the game. The predominant noise-producing activities and actions observed by WJVA staff during the football game were cheering crowds, band activities and referee whistles. Spot checking of noise levels associated with these activities took place at six locations (S-1 through S-6) in the vicinity of residential land uses near the football stadium. The locations of these six short-term measurements sites are provided on Figure 1.

As described above, audible noise associated with football game activities generally fell into three categories; 1. Cheering crowd, 2. Band activities (including half time performances), and 3. Referee whistles. Table III provides WJVA-observed noise levels associated with these three components at each of the six short-term sites. It should be noted, at some of the short-term sites, noise associated with game activities (either all or some of the described components) were not audible above existing ambient noise levels (S-2 and S-3) or were not measurable over existing elevated noise levels associated with roadway traffic noise (S-5 and S-6). These instances are described as N/A in Table III below.

TABLE III			
MEASURED NOISE LEVELS DURING FOOTBALL GAME CARMEL HIGH SCHOOL STADIUM OCTOBER 1, 2022			
Site	Noise Levels Football Game Noise Sources, dBA L <sub>max</sub>		
	Crowd Cheering	Band Activities	Referee Whistle
S-1	45-48	48-50	50-51
S-2	N/A	46-48	49-50
S-3	N/A	N/A	N/A
S-4	49-51	51-52	52-53
S-5	N/A	N/A	N/A
S-6	N/A	N/A	N/A

N/A: Not Audible/Not Measurable  
 Source: WJV Acoustics, Inc.

**COMPARISON TO PREVIOUS FINDINGS-**

WJVA previously prepared an Environmental Noise Assessment (ENA) for the Carmel High School Stadium Improvements Project (July 6, 2021/updated August 11, 2022). As part of the ENA, WJVA applied noise levels previously measured at a high school football game in Visalia, California, to estimate football game noise levels at residential areas in the vicinity of Carmel High School. Based upon these reference noise level measurements, WJVA had estimated that CHS game-day noise levels would be in the range of approximately 50-60 dB L<sub>eq</sub> and 60-70 dB L<sub>max</sub>, at residential land uses closest to the stadium.

Noise level levels measured in the vicinity of residential land near the stadium during the October 1, 2022 football game at CHS (summarized above in Table I and Table III) were generally lower than these previously calculated noise levels provided in the project ENA. Noise levels at the four measurements sites were in the range of approximately 47-51 dB L<sub>eq</sub> (hourly energy average noise levels) and in the range of approximately 60-72 dB L<sub>max</sub> (hourly maximum noise levels). Although, it should be noted, based upon spot-check noise levels observed by WJVA staff during the football game event, these maximum noise levels provided in Table I were likely the result of vehicle passbys (G-3 and G-4) or other non-game-related activities.



### **CONCLUSIONS-**

Noise levels were measured by WJVA staff in the vicinity of residential areas near the Carmel High School stadium, during a football game event held on October 1, 2022. The game took place between approximately 2:00 p.m. and 4:30 p.m., between Carmel High School and Soquel High School. WJVA staff conducted continuous noise level measurements at four sites and short-term measurements at an additional six sites, during the course of the football game. Generally speaking, noise levels during the football game were measured to be less than 50 dB  $L_{eq}$  (hourly energy average noise level) and less than 70 dB  $L_{max}$  (maximum hourly noise level) in the vicinity of residential land uses near the stadium. As described above, it is important to understand that these measured noise levels take into account all noise sources in the vicinity of the noise measurement sites, and should therefore be considered a worst-cases assessment of noise levels associated with football game activities at the CHS stadium.

WJVA staff observed noise levels associated with the three noise-producing components associated with the football game (cheering crowds, band (including half time performances) and referee whistle) to be in the range of 45-53 dB  $L_{max}$  in the vicinity of the closest residential land uses to the stadium. Additionally, noise levels measured during the football game were comparable to those previously measured during the same hours (2:00 p.m. to 5:00 p.m.) on a day with no activities occurring at the stadium. With the exception of measurement location G-1, there was no measurable increase in noise levels during game day as compared to those previously measured without activities occurring at the stadium.

Lastly, football game noise levels previously calculated by WJVA as part of the original Environmental Noise Assessment (ENA) for the project were slightly higher than those measured and observed by WJVA during the football game on October 1, 2022. Therefore, it can be determined that football noise levels (and all associated noise-producing components) estimated in the original ENA should be considered a worst-cases assessment of noise levels that occur during stadium activities at CHS.

It should be noted, while game day attendance at proposed Friday evening football games at CHS are anticipated to be higher than those observed at the October 1, 2022 game, the highest observed noise levels (associated with band activities and referee whistles) would not be expected to increase over those measured by WJVA at the October 1, 2022 football game. And while noise associated with crowd cheering may increase slightly, it would not be expected to exceed noise levels estimated by WJVA in the original ENA prepared for the project.

Ms. Teri Wissler Adam  
Senior Principal  
EMC PLANNING GROUP INC.  
October 5, 2022  
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Please contact me at 559-627-4923 or [walter@wjavacoustics.com](mailto:walter@wjavacoustics.com) if there are questions or additional information is required. Thank you.

Sincerely,

WJV ACOUSTICS, INC.

A handwritten signature in black ink, appearing to read "Walter Van Groningen", with a long horizontal flourish extending to the right.

Walter J. Van Groningen  
President

**FIGURE 1: PROJECT VICINITY AND GAME DAY NOISE MEASUREMENT SITES**

