

From: **ConcernedCarmel Residents** <concernedcarmelresidents@gmail.com>
 Date: Sat, Oct 8, 2022 at 7:32 AM
 Subject: Carmel High School Stadium Improvements SCH# 2021050293
 To: <feedback@carmelunified.org>

1

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

1
con't.

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

1
con't.

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 29th 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.

1
con't.

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

1
con't.

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*

1
con't.

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 <u>Significant and UNAVOIDABLE</u> 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.

1
con't.

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?

1
con't.

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?

1
con't.

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

1
con't.

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.

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.

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 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:

(<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.

1
con't.

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

1
con't.

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 aligned 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 Summer 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 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:

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 27th, 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.

1
con't.

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 27th 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 10th, 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

1
con't.

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 8th, 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

1
cont.

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 15th, 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

1
con't.

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 14th, 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 boylii*)
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 14th, 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

1
con't.

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_{dn} 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_{dn} 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

Contacts

Board President

Sara Hinds

shinds@carmelunified.org

408.218.5122

Board Clerk

Tess Arthur

tarthur@carmelunified.org

831.596.5170

Board Member

Seaberry Nachbar

snachbar@carmelunified.org

Board Member

Karl Pallastrini

kpallastrini@carmelunified.org

831.915.2384

Board Member

Anne Marie Rosen

arosen@carmelunified.org

Superintendent

Ted Knight, Ed.D.

tknight@carmelunified.org