Exhibit O

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Hexagon Transportation Consultants, Inc.

Memorandum

Date: January 8, 2025

To: John Haupt, Carmel Valley Manor

From: Ollie Zhou
Nivedha Baskarapandian

Subject: Transportation Study for the Proposed Carmel Valley Manor Master Plan in Monterey County, California

Hexagon Transportation Consultants, Inc. has completed a transportation study for the proposed Carmel Valley Manor Master Plan at 8545 Carmel Valley Road in Carmel-by-the-Sea in Monterey County, California (Figure 1). The project is proposing a series of building demolitions and constructions and a series of facility amenities for residents and employees (Figure 2). The site currently has 146 independent living units, 24 assisted living units, a nursing home with 36 beds, and 7 visitor quarters. The proposed project proposes the following:

- 12 additional independent living units
- 1 additional visitor quarter
- A new 12-bed memory care facility

In addition, there are also five single family homes at the end of Los Arboles Drive that are part of the Carmel Valley Manor Master Plan. Rather than converting these units to each allow for an ADU on site, all five homes are proposed to be demolished and reconstruted to independent living units as part of the Carmel Valley Manor. There are currently 274 parking spaces on site. With the proposed project, the parking count will be increased by 60 spaces to 334 spaces. Access to the site is currently provided by Carmel Valley Manor roadway at Carmel Valley Road. The project proposes no access changes.

The memo quantifies the number of trips generated by the project and its distribution, identifies any vehicle miles traveled (VMT) impacts, and reviews the project site plan to determine overall adequacy of site access, on-site circulation, and parking. The methodology, results, and conclusions are discussed below.

Project Trip Generation

Through empirical research, data have been collected that quantify the amount of traffic produced by many types of land uses. Thus, for many types of land uses, there are standard trip generation rates that can be applied to help predict the future traffic increases that would result from a new development. These trip generation rates are published by the Institute of Transportation Engineers' (ITE) in the manual entitled *Trip Generation, 11th Edition.* The following ITE rate categories are used for this project:

- Independent living units: ITE Land Use Code 252 – Senior Adult Housing Attached
- Assisted living units: ITE Land Use Code 254 – Assisted Living
- Skilled nursing facility, memory care: ITE Land Use Code 620 – Nursing Home
- Visitor quarters: ITE Land Use Code 320 – Motel

As shown in Table 1 below, based on the ITE rates, the Carmel Valley Manor is currently generating 715 daily trips, 44 AM peak hour trips, and 56 PM peak hour trips. With the proposed project, the Carmel Valley Manor would generate 780 daily trips, 48 AM peak hour trips, and 58 PM peak hour trips. This means that the proposed project would generate an additional 65 daily trips, 4 AM peak hour trips, and 2 PM peak hour trips onto the roadway network.

Since the amount of peak hour traffic generated on the roadway is small (roughly one trip per 15 to 30 minutes), it is not expected to have a noticeable effect on nearby intersection operations or during school peak operations. Therefore, a detailed intersection operations analysis is not included in this study.

Table 1
Trip Generation Estimates

			Daily		AM Peak Hour				PM Peak Hour			
Land Use	**Size**	**Unit**	**Rate**	**Trips**	**Rate**	**In**	**Out**	**Total**	**Rate**	**In**	**Out**	**Total**
Existing												
Assisted Living [1]	24	d.u/beds	2.6	62	0.18	2	2	4	0.24	2	4	6
Independent Living [2]	146	d.u.	3.24	473	0.2	10	19	29	0.25	21	16	37
Skilled Nursing Facility [3]	36	beds	3.06	110	0.14	4	1	5	0.14	2	3	5
Visitor Quarters [4]	7	units	3.35	23	0.35	1	1	2	0.36	2	1	3
Single Family Units [5]	5	d.u.	9.43	47	0.7	1	3	4	0.94	3	2	5
Total	***218***			***715***		***18***	***26***	***44***		***30***	***26***	***56***
Proposed Master Plan												
Assisted Living [1]	24	d.u/beds	2.6	62	0.18	2	2	4	0.24	2	4	6
Independent Living [2]	168	d.u.	3.24	544	0.2	12	22	34	0.25	24	18	42
Skilled Nursing Facility, Memory Care [3]	48	beds	3.06	147	0.14	5	2	7	0.14	2	5	7
Visitor Quarters [4]	8	units	3.35	27	0.35	1	2	3	0.36	2	1	3
Total	***248***			***780***		***20***	***28***	***48***		***30***	***28***	***58***
Net Project Trips	**30**	**d.u./beds**	**2.167**	**65**		**2**	**2**	**4**		**0**	**2**	**2**

Notes:
All trip rates referenced ITE *Trip Generation, 11th Edition.*
1. ITE Land Use Code 254 - Assisted Living
2. ITE Land Use Code 252 - Senior Adulting Housing - Attached
3. ITE Land Use Code 620 - Nursing Home
4. ITE Land Use Code 320 - Motel

Vehicle Miles Traveled Analysis

The California Environmental Quality Act (CEQA) guidelines specify that transportation impacts are to be evaluated based on Vehicle Miles Traveled (VMT). VMT measures the number of vehicle trips and trip length and is a direct measurement of greenhouse gas emissions. A reduction in VMT would result in a reduction in greenhouse gas emissions and supports the development of multimodal transportation networks and a diversity of land uses that reduce the reliance on individual vehicles.

VMT Impact Criteria

The County of Monterey, at the time of this report, has not yet adopted any analysis procedures, standards, or guidelines. In the absence of an adopted policy with impact thresholds, this assessment relies on guidelines published by the Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018. The guidelines set forth procedures for determining project impacts on VMT based on the project description, characteristics, and location. The VMT methodology also includes screening criteria that are used to identify types, characteristics, and locations of projects that would not exceed the VMT thresholds of significance. If a project meets the screening criteria, it is then presumed that the project would result in a less than significant impact on VMT, and a detailed VMT analysis is not required.

Screening for VMT Analysis

Land use projects that meet at least one of the following screening criteria are presumed to have a less than significant impact on VMT and do not require CEQA transportation analysis:

1. Small Projects (generating 110 daily trips or less)
2. Retail uses of 50,000 square feet or less ("Local Serving Retail")
3. Local serving public projects such as fire stations, neighborhood parks, libraries, and community centers
4. 100% Affordable Housing projects
5. Transit Supportive Projects

As shown in Table 1, the project is estimated to generate an additional 65 daily trips, which would qualify the project for the small project screening. As a result, the project can be presumed to generate a less than significant VMT impact.

Site Access and Circulation

The site access and on-site circulation evaluation is based on the site plan prepared by Perkins Eastman (see Figure 2).

Site Access

As shown on the site plan, the project would continue to use its existing driveway on Carmel Valley Road and proposes no changes to the driveway or intersection controls. At the cul-de-sac of Los Arboles, there is an existing U-shaped roadway connecting the cul-de-sac and Carmel Valley Manor's internal roadway. This roadway is proposed to be straightened out and will intersect with the internal roadway at a 90-degree angle. The internal roadway is straight for about 200 feet either direction from the proposed intersection, so there would be adequate sight distance. Hexagon recommends the new street segment be stop-controlled at its intersection with the internal roadway.

While the Carmel Valley Manor (CVM) will be connected with Los Arboles Drive under both existing and project conditions, CVM asks their staff, residents and guests to not use Los Arboles Drive, which is a residential street. The presence of this connection provides insurance for both Los Arboles Drive residents, and CVM to evacuate using each other's roads if either of these roads are blocked in an emergency. If this connection was closed, both the CVM and Los Arboles Drive would become single-access roadways, which would heighten evacuation risks during emergencies.

On-Site Circulation

The only existing parking lot to be removed is at the northwest corner of the site. The project proposes a new surface parking lot at the southeast corner of the project site for guests and employees. The site plan shows that Carmel Valley Manor internal road would provide access to the parking lot.

Commercial Vehicles and Shuttles

Commercial vehicles such as delivery trucks and shuttles would use Carmel Valley Manor and the internal roadways to navigate the project site. These vehicles would enter the project site via Carmel Valley Manor, would circulate the site, and use the parking lots or loading zones provided throughout the site (see Figure 2). The site shows acceptable connectivity and maneuvering for commercial vehicles and shuttles.

According to Carmel Valley Manor (CVM), shuttle service at CVM is a combination of fixed routes and on demand service. Most residents do not leave campus on a regular basis. CVM provides three meals a day except Sunday. Prescriptions are delivered along with grocery deliveries. Many residents never leave campus except for vacations.

Figure 1
Site Location

NORTH
Not to Scale

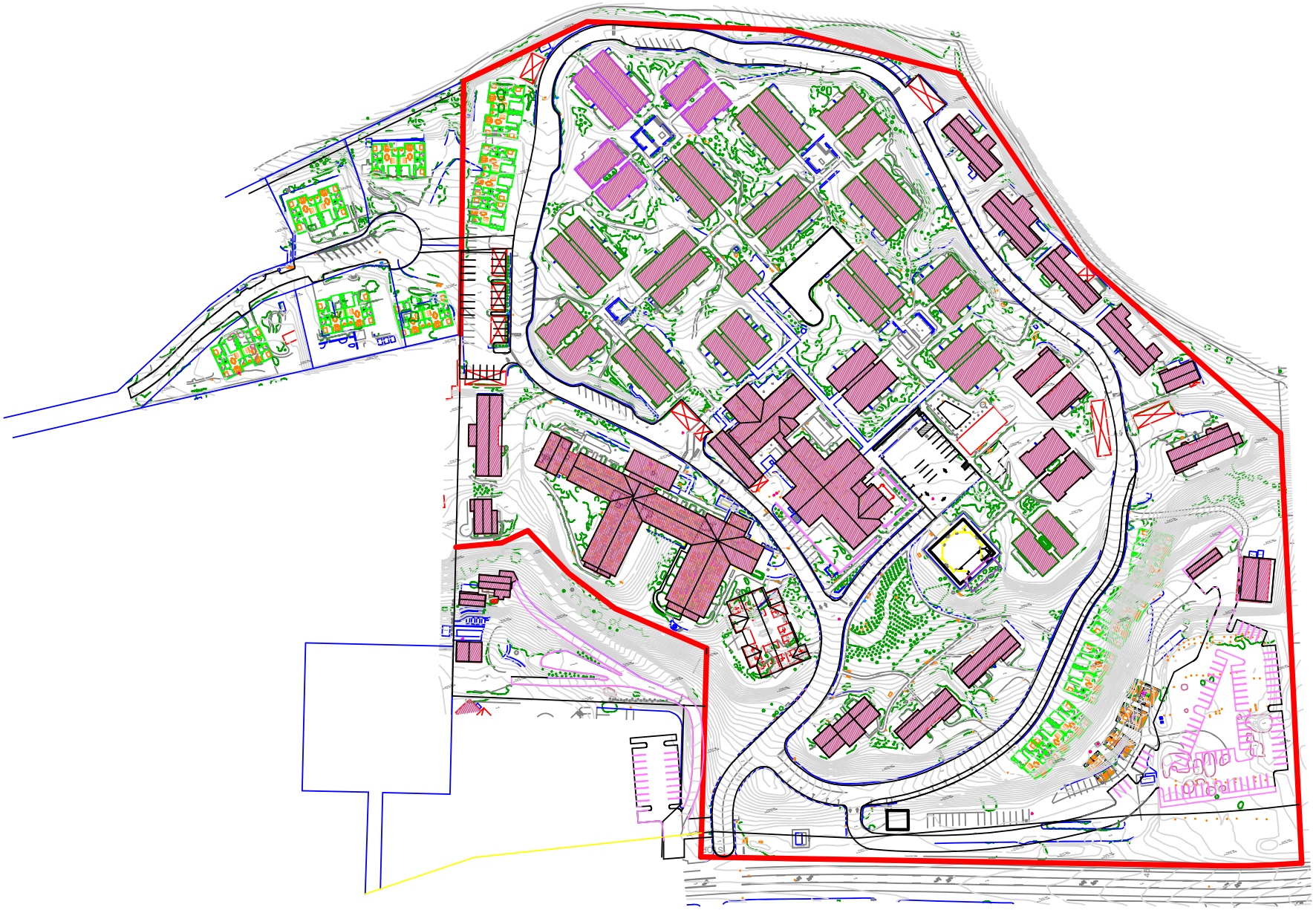

Figure 2
Site Plan

NORTH
Not to Scale